

AIRFIELD & TERMINAL MODERNIZATION PROJECT

LOS ANGELES INTERNATIONAL AIRPORT (LAX)



DRAFT ENVIRONMENTAL IMPACT REPORT (DRAFT EIR)

Appendix A Notice of Preparation/Scoping



[State Clearinghouse No. 2019049020]

City of Los Angeles
Los Angeles World Airports



October 2020

Appendix A – Notice of Preparation/Scoping

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Appendix A.1 Notice of Preparation/Initial Study

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Los Angeles International Airport

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Date: 4-1-19

AIRFIELD & TERMINAL MODERNIZATION PROJECT

Notice of Preparation and Initial Study

April 4, 2019

Lead Agency:



Los Angeles City File No. NP-19-001-AD

Prepared by:



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California Environmental Quality Act (CEQA)
NOTICE OF PREPARATION
OF AN ENVIRONMENTAL IMPACT REPORT

DATE: April 4, 2019

TO: Office of Planning and Research –
State Clearinghouse,
Responsible or Trustee Agency, and
Interested Parties

FROM: City of Los Angeles
Los Angeles World Airports
6053 Century Boulevard, Suite 1050
Los Angeles, California 90045

PROJECT NAME: Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project

PROJECT LOCATION/ADDRESS: The project site is located at LAX, which is situated within the western portion of the City of Los Angeles, an incorporated city within Los Angeles County (see **Figure 1**). The project would include a number of improvements at LAX within the north and south airfields, Central Terminal Area (CTA), and portions of airport property situated east of Sepulveda Boulevard both north and south of Century Boulevard. The north airfield improvements would be situated south of Runway 6L-24 R and between Pershing Drive on the west and Sepulveda Boulevard on the east. The south airfield improvements would be situated east of Sepulveda Boulevard and west of Aviation Boulevard, at Taxiway C. The terminal and landside improvements would generally be bound by Terminal 1 to the west, Airport Boulevard to the east, the approximate location where Lincoln Boulevard merges with Sepulveda Boulevard to the north, and the LAX south airfield to the south, as shown in **Figure 2**.

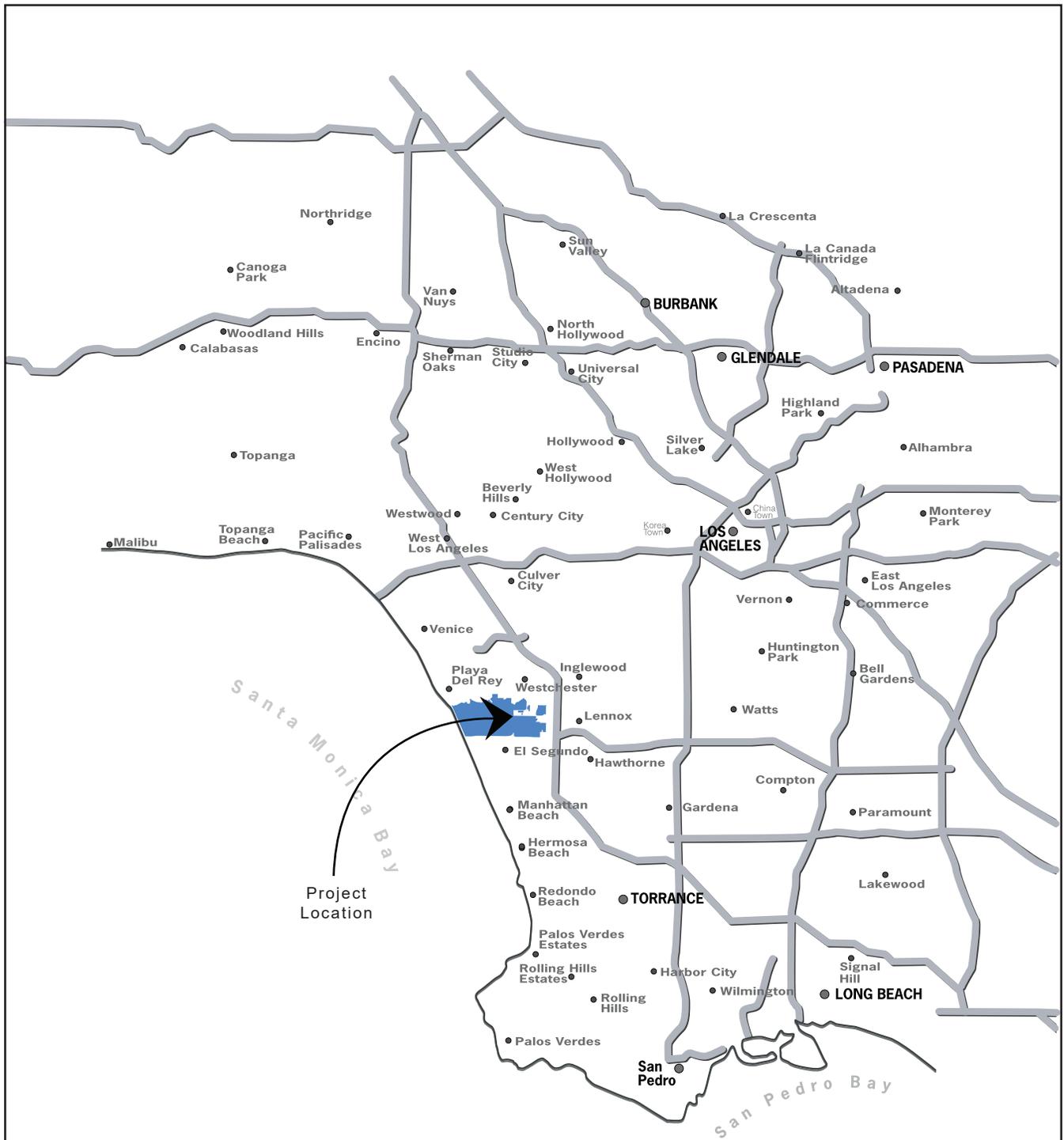
COMMUNITY PLANNING AREA: LAX Plan, Westchester-Playa del Rey Community Plan

COUNCIL DISTRICT: 11

DUE DATE FOR PUBLIC COMMENTS: May 6, 2019

The Los Angeles World Airports (LAWA), a propriety department of the City of Los Angeles (City), will be the Lead Agency and will prepare an Environmental Impact Report (EIR) for the project identified below (proposed project). LAWA, as the Lead Agency, must prepare and distribute a Notice of Preparation (NOP) after it decides to prepare an EIR. LAWA, through the NOP, solicits participation in determining the scope of the EIR from responsible public agencies (those which may have discretionary approval authority over the proposed project or an aspect of it), trustee agencies (agencies with jurisdiction over a natural resource held in public trust that the project may affect), and from local governments, regional agencies, private individuals, and organizations which may wish to respond to information provided in the NOP about the proposed project.

LAWA requests comments as to the scope and content of the EIR. Scoping meetings will be held during the 30-day NOP review period to receive input from responsible agencies, trustee agencies, and the public as to the scope and content of the EIR. No decisions about whether to approve or disapprove the proposed project will be made at the scoping meetings.



Legend

 Los Angeles International Airport



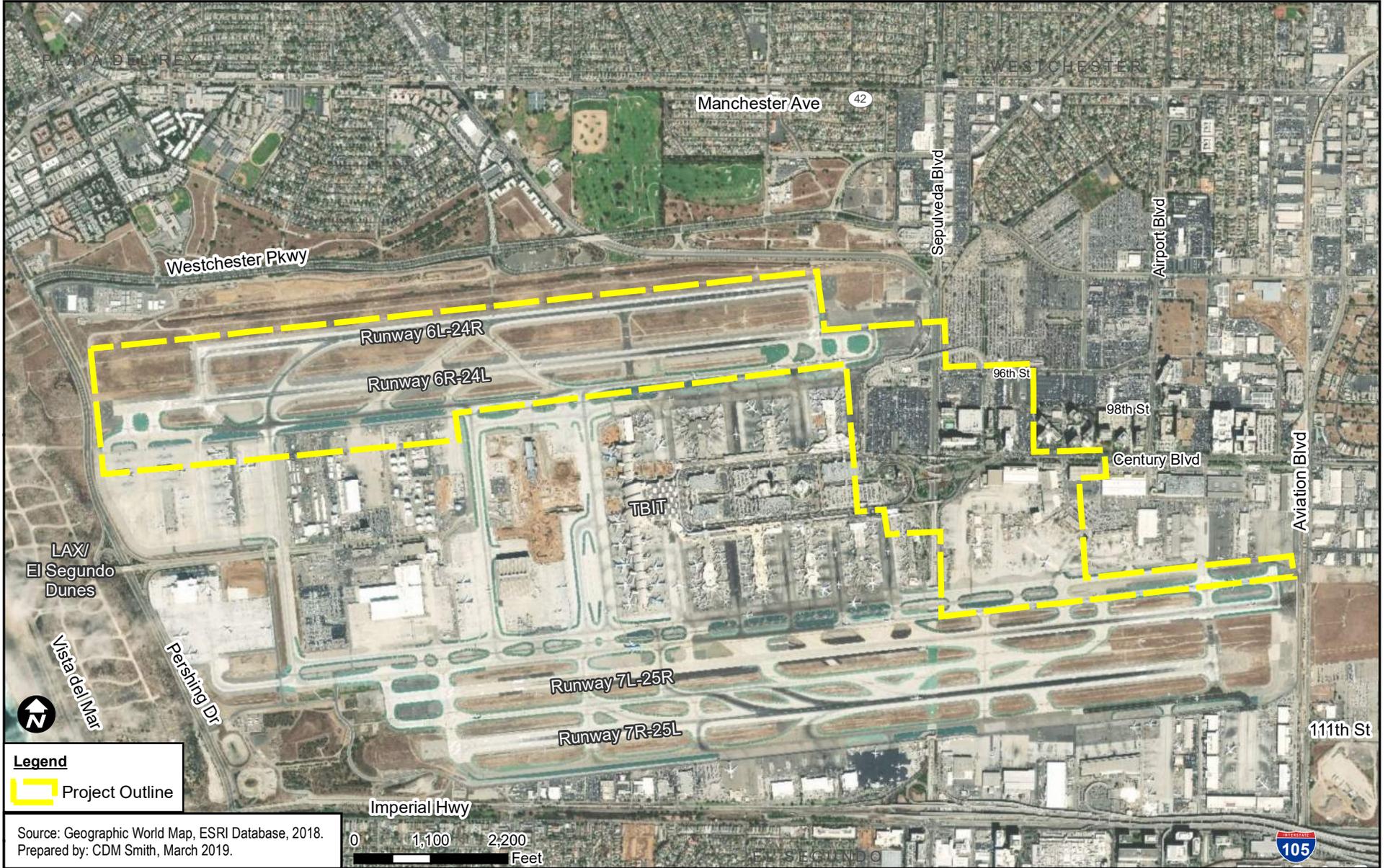
NOT TO SCALE

Source: CDM Smith, 2018.
Prepared by: CDM Smith, 2018.

LAX
Airfield and Terminal Modernization Project

Regional Location

Figure
1



LAX Airfield and Terminal Modernization Project

Project Location

Figure 2

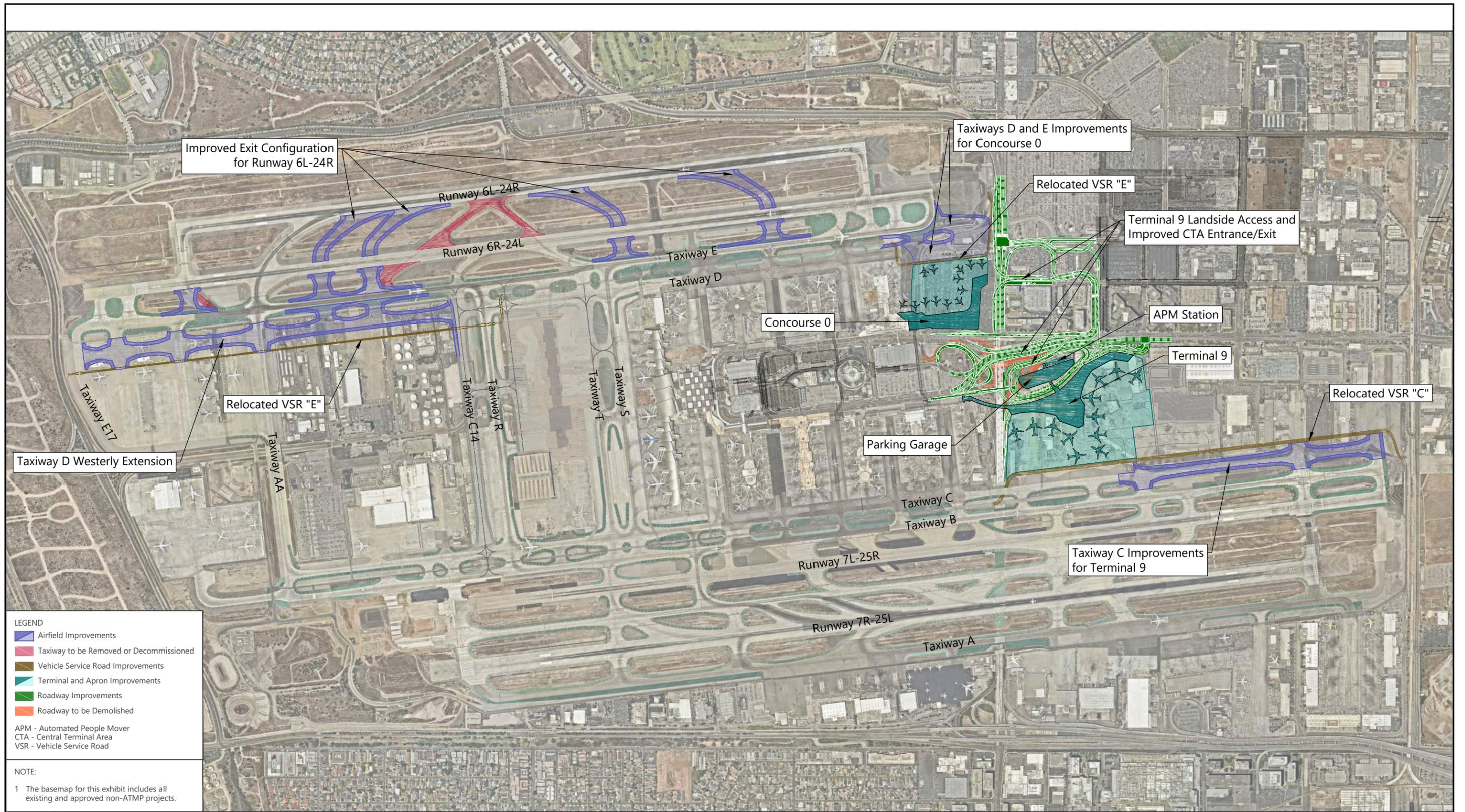
The project description, a list of agencies and City entities which may be required to take actions associated with the proposed project, and the environmental resources that may be affected by the proposed project are identified below. Also included below are the date, time, and location of the scoping meetings. The scoping meetings will be conducted in an open house format.

A copy of the Initial Study prepared for the proposed project is available during the 30-day NOP review period at LAWA’s website at <http://www.lawa.org/ATMP> and at the locations listed below:

Los Angeles World Airports 6053 Century Boulevard, Suite 1050 Los Angeles, CA 90045	City of Los Angeles Office of the City Clerk 200 N. Spring Street, Room 360 Los Angeles, CA 90012	Westchester-Loyola Village Branch Library 7114 W. Manchester Avenue Los Angeles, CA 90045
Playa Vista Branch Library 6400 Playa Vista Drive Los Angeles, CA 90094	Inglewood Public Library 101 W. Manchester Boulevard Inglewood, CA 90301	El Segundo Public Library 111 W. Mariposa Avenue El Segundo, CA 90245
Culver City Library 4975 Overland Avenue Culver City, CA 90230	Hawthorne Library 12700 Grevillea Avenue Hawthorne, CA 90250	Lennox Library 4359 Lennox Boulevard Lennox, CA 90304

PROJECT DESCRIPTION: LAWA proposes to implement airfield, terminal, and landside roadway improvements at LAX as part of LAWA’s continuing commitment to maintain LAX as a world-class airport. The proposed project consists of several primary elements including airfield improvements that would 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 CTA and reduce congestion.

Project elements associated with the proposed project are shown in **Figure 3** and **Figure 4**. The airfield improvements would occur within the north airfield and would include the westerly extension of Taxiway D in the western portion of the north airfield, the reconfiguration of runway exits from Runway 6L-24R, and enabling projects associated with these improvements. The terminal improvements would include the construction of Concourse 0 as an easterly extension of Terminal 1; construction of Terminal 9, a new passenger terminal located southeast of the Sepulveda Boulevard/Century Boulevard intersection, improvements and modifications to existing taxiways near Concourse 0 and Terminal 9 to facilitate aircraft access to and from the gates at those facilities, and enabling projects associated with these improvements. The landside improvements would be comprised of new arrival and departure roadways and a parking garage to support Terminal 9, an added station on the previously-approved LAX Automated People Mover (APM) line with a pedestrian connection to Terminal 9, a pedestrian corridor between Terminals 8 and 9 that would bridge across Sepulveda Boulevard, new roadway segments that would improve vehicle access into and out of the LAX CTA, and enabling projects related to these improvements.



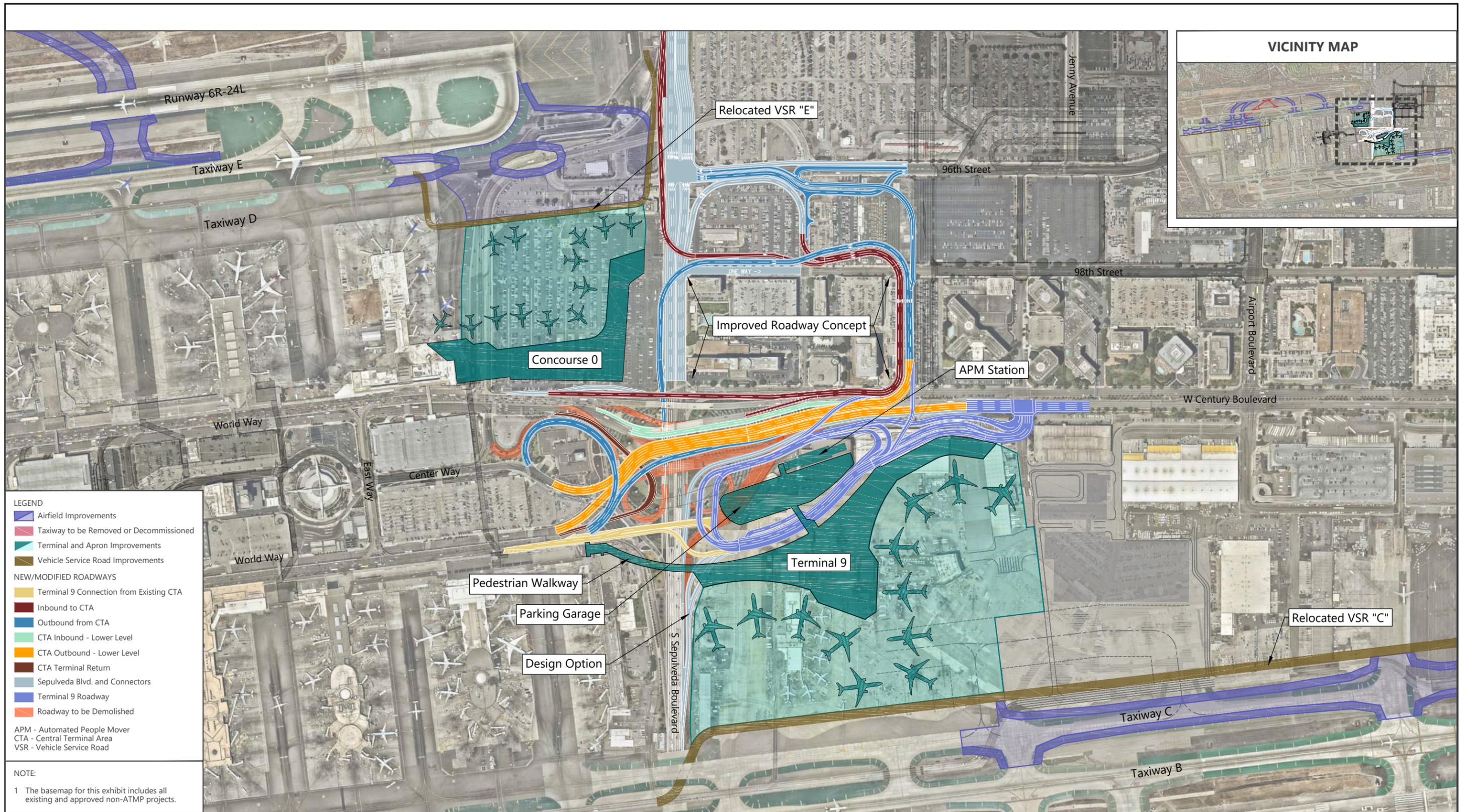
Source: Ricondo & Associates, Inc., 2018.
 Prepared by: CDM Smith, December 2018.



LAX Airfield and Terminal Modernization Project

LAX Airfield and Terminal Modernization Project Elements

Figure 3



Source: Ricondo & Associates, Inc., 2018.
Prepared by: CDM Smith, December 2018.



LAX Airfield and Terminal Modernization Project

LAX Airfield and Terminal Modernization Project Landside Element Details

Figure
4

NECESSARY APPROVALS: LAWA has principal responsibility for approving the proposed project. Agencies and City entities which may be required to take actions associated with the proposed project include, but may not be limited to, the following:

- U.S. Department of Transportation Federal Aviation Administration (FAA)
- California Department of Transportation (Caltrans)
- South Coast Air Quality Management District (SCAQMD)
- LAWA Board of Airport Commissioners
- City of Los Angeles City Council
- City of Los Angeles – various departments
- Los Angeles County Airport Land Use Commission
- Other Federal, State, or local approvals, permits, or actions as may be determined necessary

ENVIRONMENTAL RESOURCES POTENTIALLY AFFECTED: Impacts related to air quality (including human health risk), cultural resources (historical resources), energy, greenhouse gas emissions, hazards and hazardous materials, land use and planning, noise, transportation, and utilities and service systems, and their related cumulative impacts have been found to be potentially significant and will be analyzed in an EIR prepared for the proposed project. However, as outlined in the Initial Study, several individual topics within these resource areas would not result in potentially significant impacts and are not planned for further analysis in the EIR. The Initial Study found that the proposed project would have no impact, or less than significant impacts, on all other environmental resources (i.e., aesthetics, agriculture and forestry resources, biological resources, cultural resources [archaeological resources], geology and soils, hydrology and water quality, mineral resources, population and housing, public services, recreation, tribal cultural resources, and wildfire). As such, these resource areas will not be discussed in detail in the EIR.

PUBLIC SCOPING MEETING DATES AND LOCATION: Two public scoping meetings in an open house format will be held to receive public comment regarding the scope and content of the environmental information to be included in the Draft EIR. LAWA encourages all interested individuals and organizations to attend one of these meetings. The location, dates, and times of the public scoping meetings for this project are as follows:

Saturday, April 13, 2019, 10:00 a.m. to 12:00 p.m.
Flight Path Museum & Learning Center
6661 W. Imperial Highway, Los Angeles, CA 90045

Wednesday, April 17, 2019, 6:00 p.m. to 8:00 p.m.
Westchester Senior Citizen Center
8740 Lincoln Boulevard, Los Angeles, CA 90045

Arrive any time to speak one-on-one with City staff and project consultants.

NEXT STEPS: LAWA is requesting input during the NOP 30-day public review period from interested agencies, organizations, and private citizens regarding the scope and content of environmental information to be included in the EIR. In the future, public agencies receiving this notice may use the EIR prepared by LAWA when considering their permits or other approvals for the proposed project.

Any public agencies that respond to this Notice are requested, at a minimum, to:

1. Describe significant environmental issues, reasonable alternatives and mitigation measures which they would like to have addressed in the EIR.
2. State whether they are a responsible or trustee agency for the project, explain why and note the specific project elements that are subject to their regulatory authority.
3. Provide the name, address and phone number of the person who will serve as their point of contact throughout the environmental review process for this project.

LAWA welcomes all comments regarding potential environmental impacts of the project and the issues to be addressed in the EIR. All comments will be considered in the preparation of the EIR. **Written comments must be submitted to the contact and office noted below no later than 5:00 p.m. on Monday, May 6, 2019.** Written comments will also be accepted at the scoping meetings described above. The Draft EIR will analyze the significant adverse impacts from the proposed project, identify feasible potential mitigation measures, and analyze potentially feasible alternatives to the proposed project that could reduce or avoid identified significant impacts while still achieving most of the basic project objectives.

Please direct your comments to:

Evelyn Quintanilla
Los Angeles World Airports
P.O. Box 92216
Los Angeles, California 90009-2216
(800) 919-3766

Comments can also be submitted on LAWA's website at <http://www.lawa.org/ATMP>.

Signature:



Evelyn Quintanilla
Chief of Airport Planning II
Date: April 1, 2019

LOS ANGELES INTERNATIONAL AIRPORT

AIRFIELD AND TERMINAL MODERNIZATION PROJECT

INITIAL STUDY

1. INTRODUCTION

Los Angeles World Airports (LAWA) is the lead agency for the Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project (referred to hereafter as the proposed project). The proposed project includes airfield, terminal, and landside roadway improvements at LAX as part of LAWA's continuing commitment to maintain LAX as a world-class airport. The proposed project consists of several primary 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.

The airfield improvements would occur within the north airfield and would include the westerly extension of Taxiway D in the western portion of the north airfield, the reconfiguration of runway exits from Runway 6L-24R, and enabling projects associated with these improvements. The terminal improvements would include the construction of Concourse 0 as an easterly extension of Terminal 1, construction of Terminal 9, a new passenger terminal located southeast of the Sepulveda Boulevard/Century Boulevard intersection, improvements and modifications to existing taxiways near Concourse 0 and Terminal 9 to facilitate aircraft access to and from the gates at those facilities, and enabling projects associated with these improvements. The landside improvements would be comprised of new arrival and departure roadways and a parking garage to support Terminal 9, an added station on the previously-approved LAX Automated People Mover (APM) line with a pedestrian connection to Terminal 9, a pedestrian corridor between Terminals 8 and 9 that would bridge across Sepulveda Boulevard, new roadway segments that would improve vehicle access into and out of the LAX CTA, and enabling projects related to these improvements. Each of these project elements is described in greater detail below.

2. PROJECT LOCATION AND SURROUNDING LAND USES

2.1 Regional Setting

As shown in Figure 1, the project site is located within the City of Los Angeles, at LAX on LAWA property. The project site is located within the LAX Plan area of the City of Los Angeles, which is in the County of Los Angeles. LAX is the primary airport for the greater Los Angeles area, encompassing approximately 3,800 acres, and is situated at the western edge of the City of Los Angeles.

In the LAX vicinity, the community of Westchester is located to the north, the City of El Segundo is to the south, the City of Inglewood and unincorporated portions of Los Angeles County are to the east, and the Pacific Ocean lies to the west. Regional access to LAX is provided by Interstate 105 (I-105), which runs east-west and is located adjacent to LAX on the south, and the San Diego Freeway (Interstate 405 or I-405), which runs north-south and is located east of LAX. Major roadways serving LAX include Sepulveda Boulevard, Century Boulevard, Imperial Highway, and Lincoln Boulevard.

2.2 Local Setting and Land Uses

The proposed project improvement areas (hereafter referred to as the project site) are located within the northern and eastern portions of LAX (Figure 2). These areas consist of highly-developed land within and adjacent to a busy international airport. The land use setting around the project site is characterized by airport operations with commercial uses along Sepulveda Boulevard and Century Boulevard, and commercial uses, a Los Angeles Community College District educational facility,¹ and vehicle parking (surface and structured parking) along 96th Street, 98th Street, and Vicksburg Avenue. West of the project area are the Los Angeles/El Segundo Dunes, a designated Ecologically Sensitive Habitat Area, and beyond the Dunes is the Pacific Ocean.

The proposed airfield improvements are situated within a portion of the airport that includes paved airfield areas, airfield access roadways, remote gates, and other aviation-related uses, such as maintenance facilities and fuel storage facilities. The Concourse 0 site is occupied by a surface vehicle parking lot (Park One) and a groundwater remediation system to address past contamination beneath the site. The Terminal 9 site encompasses existing cargo and maintenance facilities, the LAX Records Retention Building, and an American Eagle commuter facility. The proposed landside improvements would be located in proximity to several hotels (Hyatt Regency Los Angeles, H Hotel/Homewood Suites, Courtyard by Marriott), surface and structured parking facilities, the Los Angeles College Aircraft School, and other commercial uses. Also within the project improvement area is the entrance to LAX, located at World Way and Sepulveda Boulevard.

The Los Angeles International Airport Plan (LAX Plan), the City of Los Angeles General Plan Land Use Element that governs uses on LAX, designates the project site as Airport Airside and Airport Landside.^{2,3} The corresponding LAX Specific Plan designates this area as LAX Zone: Airport Airside Subarea and LAX Zone: Airport Landside Subarea.⁴

3. PROJECT DESCRIPTION

3.1 Project Elements

The main elements of the proposed project include airfield improvements, concourse and terminal improvements, and landside roadway improvements. Figure 3 and Figure 4 delineate the nature and locations of the overall improvements, and the following sections provide details regarding each of the main elements, including the proposed improvements and their associated enabling projects. Enabling projects refer to existing uses located in or near the proposed improvement areas that would need to be

¹ The Los Angeles Community College District property is improved with two airplane hangars that West Los Angeles College currently uses for the warehousing of movie set props and for instruction to support its Film/Television Production Crafts program. Per the West Los Angeles College Fall 2018, Winter 2019, and Spring 2019 course schedules, only one course per quarter currently takes place at the facility. Film Production 110-Set Dressing Crafts is offered two days per week for eight weeks during Fall 2018 and Spring 2019, as indicated at <http://www.wlac.edu/WLAC/media/documents/new-sis/Fall.pdf> and <http://www.wlac.edu/WLAC/media/documents/new-sis/Spring.pdf>, and VOC ED 097CE-Blueprint for Customer Service, a one week vocational education course, is offered in Winter 2019, as indicated at <http://www.wlac.edu/WLAC/media/documents/new-sis/Winter.pdf>.

² City of Los Angeles, Department of City Planning, *LAX Plan*, adopted December 14, 2004, last amended June 7, 2017. Available: <https://www.lawa.org/en/lawa-our-lax/plan-and-ordinances>.

³ 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.

⁴ City of Los Angeles, Department of City Planning, *Los Angeles International Airport (LAX) Specific Plan*, adopted December 14, 2004, last amended September 8, 2017. Available: <https://www.lawa.org/en/lawa-our-lax/plan-and-ordinances>.

removed and/or relocated to accommodate the proposed improvements. In some cases, the removal or relocation of uses that currently exist within the project site is already planned and/or approved to occur independently from the proposed project; these removals and relocations would occur prior to and/or separately from the proposed project. The projects that have independent utility from the proposed project are noted as such in the descriptions of the enabling projects provided below.

3.1.1 Airfield Elements

The improvements associated with the airfield elements of the proposed project include the westerly extension of Taxiway D in the western portion of the north airfield, and the reconfiguration of runway exits from Runway 6L-24R in the north airfield. Details of those improvements are provided below. (Additional airfield improvements would be required to accommodate the terminal improvements. These airfield improvements are described in Section 3.1.2.)

3.1.1.1 Taxiway D Extension West

3.1.1.1.1 Characteristics

The north airfield has two runways: Runway 6L-24R, which is the outboard runway (i.e., farthest from the CTA) and Runway 6R-24L, which is the inboard runway (i.e., closest to the CTA). There are two parallel taxiways south of Runway 6R-24L, including Taxiway E, which is south of Runway 6R-24, and Taxiway D, which is south of Taxiway E. Taxiway E extends the full length of the Runway 6R-24L; however, Taxiway D only extends along the eastern two-thirds of Runway 6R-24. As such, arriving and departing aircraft on the north airfield that are taxiing in an east-west direction are limited to a single taxiway (Taxiway E) while in the western portion of the airfield, which hinders the efficient movement of aircraft, particularly during peak times of aircraft activity.

As shown on **Figure 5**,⁵ the proposed Taxiway D Extension West includes an extension of Taxiway D from Taxiway C14 to Taxiway E17. Federal Aviation Administration (FAA) design standards for airport runways and taxiways take into consideration the size of aircraft that may be operating on the runway or taxiway relative to providing adequate distance from other aircraft and other movement activity occurring nearby. Aircraft size is defined by the FAA in terms of Airplane Design Group (ADG). Examples of ADG sizes of aircraft that are common to LAX include the Boeing 737 and Airbus A320, which are ADG III; the Boeing 757 and 767, which are ADG IV; the Boeing 747, 777, and 787, which are ADG V; and the Airbus A380, which is ADG VI. The proposed westerly extension of Taxiway D is designed with ADG VI separation from Taxiway E, and the accompanying new vehicle service road proposed south of the Taxiway D extension is designed at ADG VI separation from Taxiway D. The location and design of the proposed taxiway extension would improve airfield efficiency by segregating eastbound and westbound taxiing aircraft on Taxiways D and E. With the proposed improvements, ADG VI aircraft could use the Taxiway D extension instead of Taxiway E to avoid operational restrictions during ADG VI arrival and departure operations on Runway 6R-24L.

3.1.1.1.2 Enabling Projects

Demolition and relocation of existing facilities to enable the taxiway extension are considered to be enabling projects for the proposed taxiway extension. **Figure 6** and **Figure 7** depict the enabling projects identified for the Taxiway D Extension West element of the project. The airfield enabling projects consist of the following:

- Removal of Vehicle Service Road E between Taxiway E17 and Taxiway R.

⁵ Figures in this portion of the Initial Study are provided at the end of the text (following Section 5).

-
- Removal of the passenger holding areas for west remote gates #228, #229, #230, and #231 (Note: The affected west remote gates and associated aircraft parking positions, described below, would be replaced by the new gates associated with development of Concourse 0 and Terminal 9 described in Section 3.1.2).
 - Removal of west remote gate aircraft parking positions.
 - Removal of remain overnight (RON) aircraft parking positions.
 - Removal of the ground support equipment (GSE) staging area immediately west of Taxiway AA.
 - Removal of LAWA maintenance facilities situated in the northern portion of the LAWA maintenance yard, including two buildings, a service area, a storage area, and an auto vehicle parking area.
 - Removal of some FedEx facilities, including an aircraft parking position, aircraft apron area, a hazardous materials storage shed, and a GSE staging area.
 - Removal of or modifications to FedEx’s workshop.
 - Relocation of aircraft fueling system infrastructure located at the north end of the LAX Fuel Farm.
 - Removal of LAWA’s airfield busing and parking facilities.⁶
 - Removal and relocation of Southwest Airlines’ GSE/vehicle maintenance facility and garage.

3.1.1.2 Runway 6L-24R Exits

3.1.1.2.1 Characteristics

Aircraft arriving at LAX typically land on the outboard runways, while departing aircraft typically use the inboard runways. This is done to reduce noise impacts on communities to the north and south of LAX (aircraft takeoffs are noisier than landings and, therefore, are directed to the inboard runways where they are farther away from the communities than would otherwise occur on the outboard runways). As such, aircraft arriving on the outboard runway must cross the inboard runway in order to reach their gate. Presently there are two exits from Runway 6L-24R that cross the inboard runway (6R-24L) in areas defined as “high-energy zones,” which is the portion of a runway where departing aircraft are still on the ground moving at a high speed before lifting into the air.⁷

As shown on **Figure 8**, the proposed project includes the construction of new acute-angled exits on Runway 6L-24R that would cross Runway 6R-24L outside the high-energy zones. The improvements include two new exits for West Flow conditions (i.e., for Runway 24R when aircraft are arriving in a westward direction, which is the majority of time at LAX) and two new exits for East Flow conditions (i.e., for Runway 6L when aircraft are arriving in an eastward direction). The construction of new exits that would cross outside the high-energy zones would be accompanied by the removal or decommissioning of the existing exits that cross the high-energy zones (i.e., Existing Taxiways Y and Z). The new West Flow exits on Runway 24R would be located between Taxiways AA and the to-be-demolished Taxiway Z, and the new East Flow exits on Runway 6L would be located east and west of Taxiway W. In conjunction with the safety benefits of relocating runway exits outside of the high-energy zone, the new acute-angled exits would include crossings that are perpendicular to Runway 6R-24L, as opposed to the existing exits that cross Runway 6R-24L at an acute angle. Perpendicular crossings have safety benefits by providing pilots

⁶ Although these facilities presently exist within the project site, they are anticipated to be removed in conjunction with LAWA’s recent purchase of electric airfield buses, which will replace the buses that currently park at the site; the electric buses will be located elsewhere at LAX. As such, the removal of the existing airfield busing and parking facilities will occur separate from, and independent of, the proposed project.

⁷ The high-energy zone represents the approximate location of the West Flow and East Flow middle-third of the runway, based on departure declared distances.

in arriving aircraft a better line of vision, allowing them to look down Runway 6R-24L for possible departing aircraft.

Overall, implementation of the new Runway 6L-24R exits would have the following effects on airfield safety and efficiency:

- The Taxiway Z and Y runway crossings would be removed from the Runway 6R-24L high-energy zone
- The proposed acute-angle exit taxiway geometry would facilitate pilot visibility (with standard angle [i.e., 90-degree] intersections) when crossing Runway 6R-24L
- The proposed acute-angle exit taxiway geometry would better utilize the space available for aircraft holding between the north airfield runways to accommodate large aircraft
- The locations of the new acute-angled taxiways would support the narrowbody fleet operating at LAX
- The proximity of the West Flow exits to one another would provide operational flexibility and redundancy when exits are occupied during peak arrival or departure periods

3.1.1.2.2 Enabling Projects

Figure 9 depicts the enabling projects for the new Runway 6L-24R exits, all of which pertain to relocation of existing navigational aids situated near the east end of the runway. The enabling projects include:

- Relocation of the Runway 24R Precision Approach Path Indicator (PAPI)⁸
- Relocation of the Runway 24L PAPI
- Relocation of an Automated Surface Observing System (ASOS)⁹
- Relocation of a wind sock

3.1.2 Terminal Area Elements

The proposed terminal area elements consist of the following:

- Construction of Concourse 0, which would be an easterly extension of existing Terminal 1
- Construction of Terminal 9, which would be a new passenger terminal located southeast of the Sepulveda Boulevard/Century Boulevard intersection
- Improvements and modifications to existing taxiways located near Concourse 0 and Terminal 9 that would facilitate aircraft access to and from the gates at those facilities

Development of Terminal 9 would include landside access improvements (i.e., arrival and departure curbs for drop-off and pick-up of passengers, a parking garage, an added station on the previously-approved LAX APM line, and improvements to nearby roadways), which are described later in this section under Landside Elements. No landside access is proposed for Concourse 0.

3.1.2.1 Concourse 0

3.1.2.1.1 Characteristics

As shown on **Figure 10**, Concourse 0 is planned as an 11-gate concourse facility that would attach and extend to the east of Terminal 1. The two westernmost gates at Concourse 0 would replace the two

⁸ A Precision Approach Path Indicator consists of runway lights that inform pilots of the correct approach path.

⁹ An Automated Surface Observing System consists of a weather station on the airfield that provides the Air Traffic Control Tower with real-time data regarding wind speed and wind direction.

easternmost existing gates at Terminal 1. The resulting net increase of nine new gates, along with the new gates associated with Terminal 9, would serve to replace existing remote gates that would be eliminated by the proposed westerly extension of Taxiway D (see Section 3.1.1.1.2 above).

Concourse 0 would consist of at least four levels with a total floor area of approximately 745,000 square feet. As an option, Concourse 0 may include additional levels, which could accommodate approximately 318,000 square feet of office space that could be used for administrative purposes. It should be noted that design of Concourse 0 has only been formulated at a conceptual level and the total building area requirement may be refined during more detailed project design development. To account for the possibility that such design refinements may lead to additional building floor area, and in order to provide a conservative impacts analysis that includes such additional area, a 20 percent increase in total building area was assumed. **Figure 11** and **Figure 12** provide conceptual views of the proposed Concourse 0 from the landside and airside, respectively (the conceptual views do not include the optional office levels). **Table 1** provides a breakdown of the floor area associated with various functions within Concourse 0. **Figure 13** and **Figure 14** provide section views of Concourse 0 that illustrate passenger flows.

Facility	Total Area (sf) ¹
Airline Facilities	296,900
Department of Homeland Security	155,700
Commercial Program	79,800
Ancillary (loading dock, storage) maintenance closets, etc.)	5,700
Building Services	54,600
Circulation	152,000
Total Facility Area	744,700
Optional Office Levels	318,000
Total Facility Area with Optional Levels	1,062,700
Potential 20 Percent Increase During Design Refinement	212,540
Grand Total	1,275,240
Source: Los Angeles World Airports, February 2019.	
Notes:	
sf – Square Feet	
¹ Numbers rounded to the nearest 100.	

Concourse 0 would serve both domestic and international flights. International operations would be supported with sterile circulation for international arrivals, a fully contained Customs and Border Protection (CBP) Facility Inspection Service (FIS) area, international baggage claim, and a sterile bus drop-off platform for passenger busing operations, if needed. Passengers arriving at or departing from Concourse 0 would process or transfer through Terminal 1 and/or Terminal 1.5. There would be no curbside access at Concourse 0 (i.e., no drop-off or pick-up curb for passengers). Pedestrian access at Concourse 0 would be provided through Terminal 1 on both the arrivals level and the departures level and through a vertical circulation core (i.e., multi-level elevator/escalator/stairway system) at the interface between Concourse 0 and Terminal 1 that would connect to an APM station via a pedestrian bridge (see Figures 13 and 14). The APM station is part of the previously-approved LAX Landside Access Modernization Program (LAMP) APM system. Construction of the vertical circulation core and pedestrian bridge would be coordinated with the APM station.

In conjunction with construction of the passenger structure building and aircraft gates, development of Concourse 0 would include construction of an aircraft parking apron, including two remain overnight (RON) parking positions, and the easterly extension of Taxiway D as an ADG V taxiway as well as the easterly extension of Taxiway E as an unrestricted ADG V/restricted ADG VI taxiway. At the eastern ends of Taxiways D and E would be a paved area that could be used for aircraft pushbacks for the northeastern gate at Concourse 0 and could also be used to temporarily hold departing aircraft waiting to access Runway 6R-24L for takeoff.

3.1.2.1.2 Enabling Projects

As shown on **Figure 15**, the enabling projects for Concourse 0 include the following (numbers in parentheses below correspond to Figure 15):

- Removal of Park One surface parking lot (1).
- Removal of LAX Police Headquarters and vehicle parking (2).¹⁰
- Reconfiguration of an airside vehicle service road and removal of Security Post 3 (3).
- Removal of portions of 96th Street and Alverstone Avenue (4).
- Removal of a building and vehicle parking area (5) adjacent to the 96th Street Bridge.
- Removal of vehicle parking area on northwest corner of 96th Street and Alverstone Avenue (6).

The 96th Street Bridge (A) and the Reliant Medical Center (B) will be removed independently from the Airfield and Terminal Modernization Project, and prior to construction of Concourse 0, as part of the previously-approved LAX Landside Access Modernization Program.

3.1.2.2 Terminal 9

3.1.2.2.1 Characteristics

As shown on **Figure 16**, Terminal 9 is planned as a 12-gate international and domestic terminal facility with capability to support ADG VI operations.¹¹ The new gates associated with Terminal 9, along with the gates associated with Concourse 0, would serve to replace existing west remote gates that would be eliminated by the proposed westerly extension of Taxiway D (see Section 3.1.1.1.2 above). Terminal 9 would be a 1,178,000 square-foot, independently operating, four-level facility that has a central passenger processing core and a concourse that extends to the west of the core and a concourse that extends to the east of the core. All of the necessary passenger processing functions would be provided within Terminal 9. (The total building area requirement may be refined during project design. Like Concourse 0 described above, the design of Terminal 9 has only been formulated at a conceptual level and the total building area requirement may be refined during more detailed project design development. To account for the possibility that such design refinements may lead to additional building floor area, and to provide a conservative impacts analysis that includes such additional area, a 20 percent increase in total building area was assumed. **Figure 17** and **Figure 18** provide conceptual views of the proposed Terminal 9 from the landside and airside, respectively. **Table 2** provides a breakdown of the floor area associated with various functions within Terminal 9. **Figure 19** provides a section view of Terminal 9 that illustrates

¹⁰ A new Airport Police Facility is currently under construction in LAX Northside and is anticipated to be completed by early- to mid-2021. The subject facility has independent utility from the currently proposed project. Based on the timing of the new Airport Police Facility, it is possible, if not likely, that the existing LAX Police Headquarters and vehicle parking located within the project site will be vacated prior to development of the proposed project.

¹¹ Terminal 9 is being planned to accommodate primarily widebody aircraft (i.e., ADGs IV, V, and VI aircraft) such as those used for international travel. It could also be designed to instead accommodate up to 18 narrowbody aircraft (ADG III aircraft), such as those often used for domestic flights, or could be a combination of widebody gates and narrowbody gates.

passenger flows. International operations would be supported by a fully contained CBP FIS area with an international baggage claim.

Facility	Total Area (sf) ¹
Airline Facilities	307,700
Department of Homeland Security	215,600
Commercial Program	95,600
Ancillary (loading dock, storage, maintenance closets, etc.)	10,800
Building Services	94,100
Circulation	454,200
Terminal Subtotal	1,178,000
Automated People Mover Station	49,500
Total Facility Area	1,227,500
20 Percent Design Contingency	245,500
Grand Total	1,473,000
Related Facilities	
Bridges and tunnel associated with connections to Terminal 8, Parking Garage, and APM	44,100
Source: Los Angeles World Airports, February 2019.	
Notes:	
APM – Automated People Mover	
sf – Square Feet	
¹ Numbers rounded to the nearest 100.	

In addition to the passenger building, Terminal 9 would also include an aircraft parking apron and a taxilane connecting the terminal to the airfield. Other related airfield improvements that would support Terminal 9 include the relocation of Vehicle Service Road C and the easterly extension of Taxilane C from Taxiway C3 to Taxiway B1.

Landside access to Terminal 9 would be provided by new roadway segments north of the terminal, construction of a nearby station on the previously-approved LAX APM, and construction of a pedestrian corridor over Sepulveda Boulevard that would connect with Terminals 8 and 9. A pedestrian walkway would link the APM station and the new terminal; access to a new parking garage would be provided by a bridge, a tunnel, or a combination of both. These improvements are further described below under Landside Elements.

3.1.2.2.2 Enabling Projects

As shown on **Figure 20**, the enabling projects for Terminal 9 include the following (numbers in parentheses below correspond to Figure 20):

- Removal of the American Eagle Commuter Terminal (1).¹²

¹² Operations at the American Eagle Commuter Terminal are planned to be relocated to the Midfield Satellite Concourse (MSC) South Concourse, which is a separate terminal project having independent utility that was previously identified in the MSC Environmental Impact Report (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.)

-
- Removal of RON and maintenance aircraft parking areas at the western edge of the Terminal 9 site (2).
 - Removal of the Delta Air Lines GSE building (3).
 - Removal of the LAX Records Retention Building (4).
 - Removal of the Mercury Air Cargo Group facility (5).
 - Removal of a ground equipment maintenance/storage area (6).
 - Removal of aircraft maintenance support buildings (7).
 - Removal of cargo buildings (8).
 - Removal of Air Freight Building #8 (9).
 - Removal of existing Vehicle Service Road C (10) east of Sepulveda Boulevard (see Figure 20).
 - Removal of RON, cargo, and maintenance aircraft parking areas (11).

The existing Delta Air Lines Hangar Complex (A) will be removed and replaced independently from the Airfield and Terminal Modernization Project, and prior to construction of Terminal 9, as part of the previously-approved LAX Landside Access Modernization Program.

3.1.3 Landside Elements

3.1.3.1 Characteristics

As shown on **Figure 21**, the landside improvement plan is comprised of new arrival and departure roadways and a nearby parking garage to support the Terminal 9 passenger facility, along with new roadway segments that would improve vehicle access to, and egress from, the existing CTA. The landside improvement plan would also include construction of a seventh station at Terminal 9 on the previously-approved LAX APM line, as well as construction of a pedestrian corridor between Terminals 8 and 9 that would bridge across Sepulveda Boulevard.

The Terminal 9 roadways would include an upper level roadway for arrivals and a lower level roadway for departures. The roadways would also provide connections to a proposed Terminal 9 parking garage and would be integrated with the previously-approved LAMP roadway improvements, which will provide access to the future Intermodal Transportation Facility (ITF) West to be constructed as part of LAMP. The proposed new roadway improvements for the CTA would provide the following benefits:

- Creation of a common entry point east of Sepulveda Boulevard for all vehicles entering the CTA (including Terminal 9).
- Improvement to traffic flow into and out of the CTA.
- Rerouting of exiting CTA vehicles to southbound Sepulveda Boulevard via a new grade-separated ramp north of Century Boulevard to extend merging zone and vehicle queuing area.
- Establishment of new CTA access routes from Sepulveda Boulevard to encourage increased utilization of the future ITF West.
- Grade-separated movement for southbound Sepulveda Boulevard traffic accessing airport facilities.
- Simplified roadway configuration and maximized distances for driver wayfinding and decision-making to multiple destinations.

The proposed roadway system would improve overall access to and from the CTA and the future ITF West, and would serve Terminal 9, with a combination of segments that are elevated or at grade, with

connecting ramps. **Figure 22** through **Figure 25** provide 3D visualizations of various areas of the roadway system to illustrate these physical relationships.

A roadway system design option to be considered for the proposed project would include two exit ramps from northbound Sepulveda Boulevard, north of the Sepulveda Boulevard tunnel, that would connect directly to the curbside at Terminal 9; one exit ramp would lead to the arrivals level curb and the other ramp would lead to the departures level curb. **Figure 26** shows the location of these design option ramps.

3.1.3.2 Enabling Projects

As shown on **Figure 27**, the enabling projects for the landside elements would include the following (numbers in parentheses below correspond to Figure 27):

- Acquisition of the Los Angeles Community College District property (1), with removal of structures along the southern edge of the property and at the northwest corner of the property being necessary to develop the proposed roadway improvements.
- Acquisition of the commercial parking lot located north of Los Angeles Community College District property (2).
- Acquisition of the property located east of the Los Angeles Department of Water and Power (LADWP parcel), which is currently used for commercial parking (3).
- Relocation/reconfiguration of the LAX Taxi Staging Lot from the south side of W. 96th Street to the north side of W. 98th Street (4).
- Acquisition of the southern two-thirds (approximately) of the LADWP parcel located on the east side of Vicksburg Avenue, with the affected area currently being used for parking (5).¹³

3.1.4 Utilities

Implementation of the proposed project would include the provision of utilities to serve the proposed facilities, including domestic water, fire water, reclaimed water, electrical and communication systems, natural gas and fuel systems, and stormwater and wastewater systems.

Construction of the proposed project would include demolition, reconstruction, and construction of new roadways or facilities within and near the CTA. Utilities would be extended to serve the proposed buildings and would be sized for the anticipated demand loads and expected lifetimes of the facilities. Most of the existing utility main lines are located within roadway rights-of-way, providing relatively free access for maintenance, repair, or upgrades to service. Within the CTA, however, the major drainage facilities that provide direct connections from the buildings to the city storm drains and sewer systems lie under the airfield and are not located within the roadways. Some of the utilities are private facilities owned by LAWA and some are provided by the respective public utility services. LAWA typically provides the physical infrastructure for utilities (conduits, pipe, duct banks, etc.) whether they are private or public. The operating authority typically provides the supply infrastructure (such as high voltage or low voltage cable), or the utility commodity (such as water and gas, etc.). LAWA provides drainage infrastructure from LAWA properties in the CTA to the appropriate public main infrastructure such as major storm drains or wastewater sewers.

LADWP supplies water and power to the airport. This service also includes fire water and reclaimed water (provided by separate systems). Sempra Energy supplies natural gas. Telephone and internet services in the airport area are supplied by a variety of technology providers.

¹³ The LADWP electrical substation would not be acquired or affected by the proposed project.

3.2 Construction

Implementation of the various elements of the project that are described above would generally begin with undertaking the enabling projects, followed by construction of the proposed element improvements. In some cases, there would be overlap between the enabling project and the proposed improvements, such as when completion of certain enabling projects would allow the initial phases of development to proceed, while completion of other enabling projects is only needed for the latter phases of development. The project description in the Draft EIR will provide more details on the timing of construction.

3.3 LAWA Design and Construction Practices

The proposed project would be designed and constructed in accordance with LAWA's Sustainable Design and Construction Policy, which requires that the new building be designed to achieve the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED®) Silver certification.¹⁴ LEED® Silver certification requires a project to be designed in a manner to save energy, water, and other resources, and to generate less waste and support human health. In addition, the proposed project would be required to be constructed in accordance with the Los Angeles Green Building Code (LAGBC), which is based on the California Green Building Code (CALGreen).^{15,16}

4. NECESSARY APPROVALS

The City of Los Angeles has principal responsibility for approving the proposed project. Agencies and City entities which may be required to take actions associated with the CEQA approval for the proposed project include, but may not be limited to, the following:

Federal

- FAA¹⁷

State

- Department of Transportation (Caltrans)

Regional

- South Coast Air Quality Management District (SCAQMD)

Local

- LAWA Board of Airport Commissioners
- City of Los Angeles City Council, including Council Committees and City Commissions
- City of Los Angeles – various departments

¹⁴ City of Los Angeles, Los Angeles World Airports, *LAWA Sustainable Design and Construction Policy*, September 7, 2017.

¹⁵ City of Los Angeles, Los Angeles Municipal Code, Chapter IX, Article 9, *Green Building Code*, as amended.

¹⁶ 24 California Code of Regulations, Part 11, California Building Standards Commission, *2016 California Green Building Standards Code (CALGreen)*. Available: https://codes.iccsafe.org/content/document/657?site_type=public.

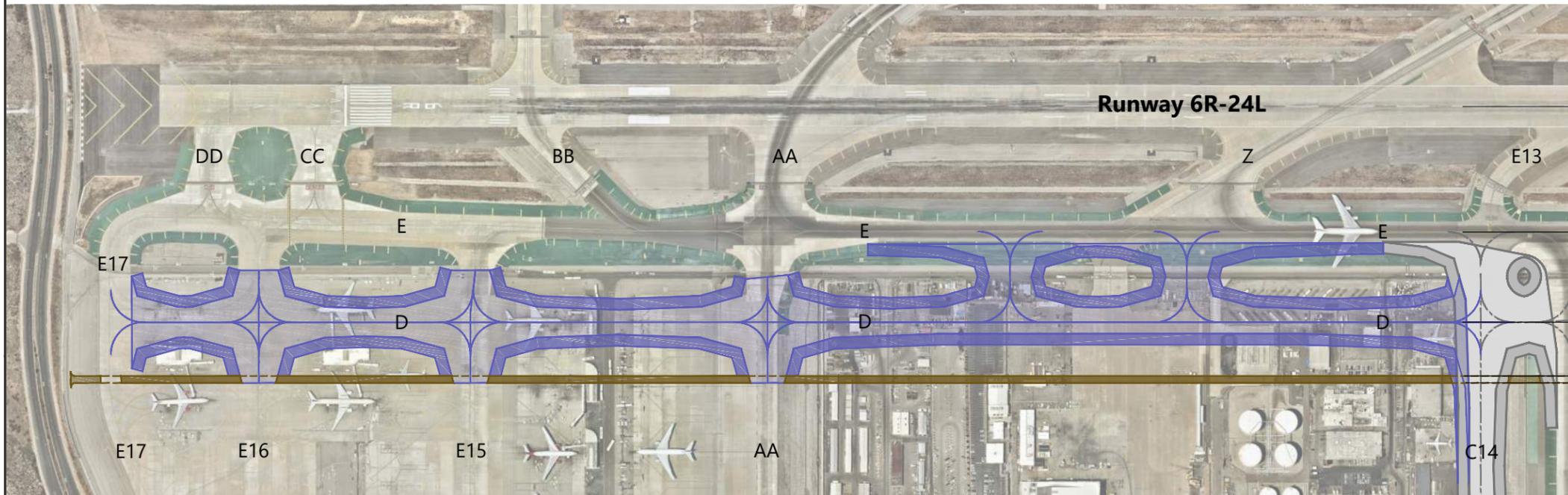
¹⁷ While FAA is not a state agency for purposes of CEQA review, the proposed project would require FAA approval of Form 7460-1 (Notice of Proposed Construction or Alteration) and an amendment to the LAX Airport Layout Plan pursuant to the grant assurances LAWA has given to the FAA.

-
- Los Angeles County Airport Land Use Commission
 - Other Federal, State, or local approvals, permits, or actions may be necessary

5. DOCUMENTS REFERENCED

Documents cited in the NOP/Initial Study are available for public inspection at the following address:

Los Angeles World Airports
6053 Century Boulevard, Suite 1050
Los Angeles, California 90045



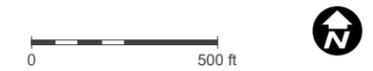
- 450 ft
Runway-to-Taxiway Separation Meeting ADG V Standards
- 324 ft
Taxiway-to-Taxiway Separation Meeting ADG VI Standards
- 193 ft
Taxiway-to-FOMO Separation Meeting ADG VI Standards
- 25 ft
Vehicle Service Road

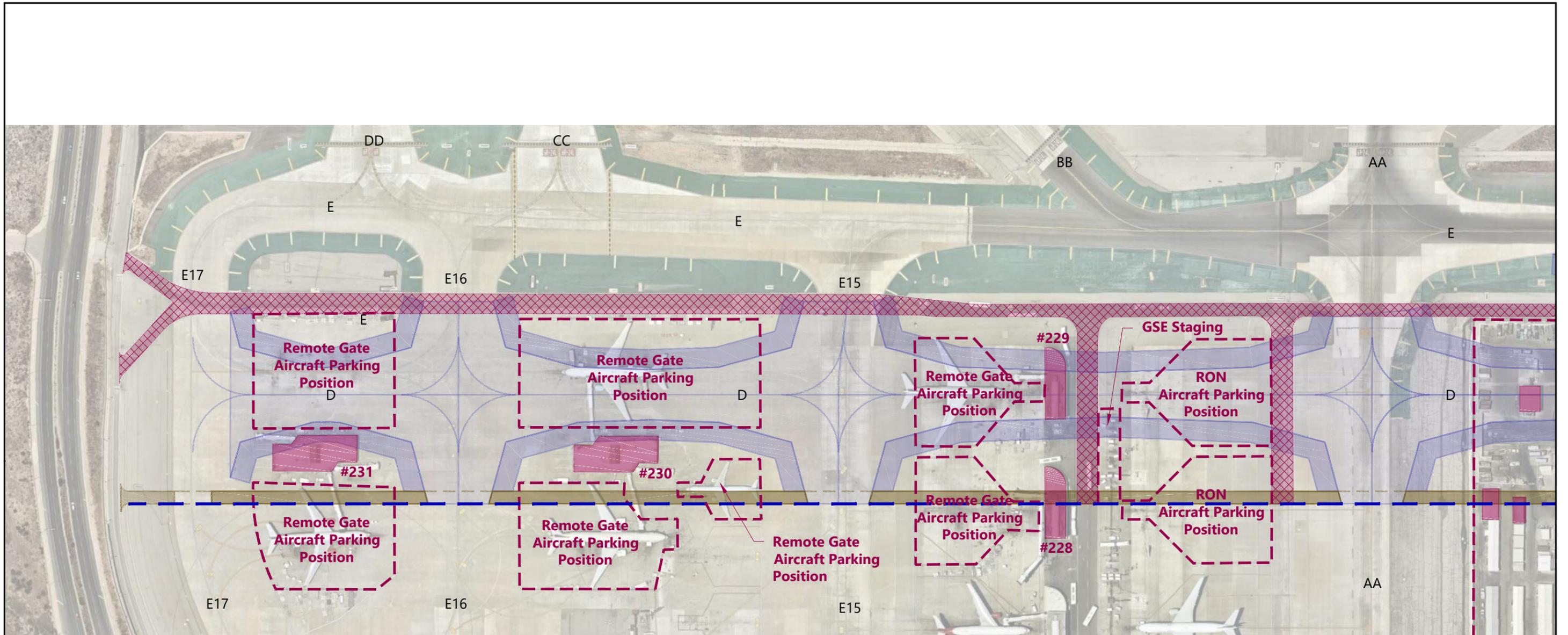
LEGEND

- ▬ Proposed ATMP Airfield Improvement
- ▬ Proposed Vehicle Service Road Improvement
- ▬ Approved Airfield Improvement not part of ATMP

ADG - Airplane Design Group
FOMO - Fixed or Moveable Object

Source: Ricondo & Associates, Inc., 2018.
Prepared by: CDM Smith, December 2018.





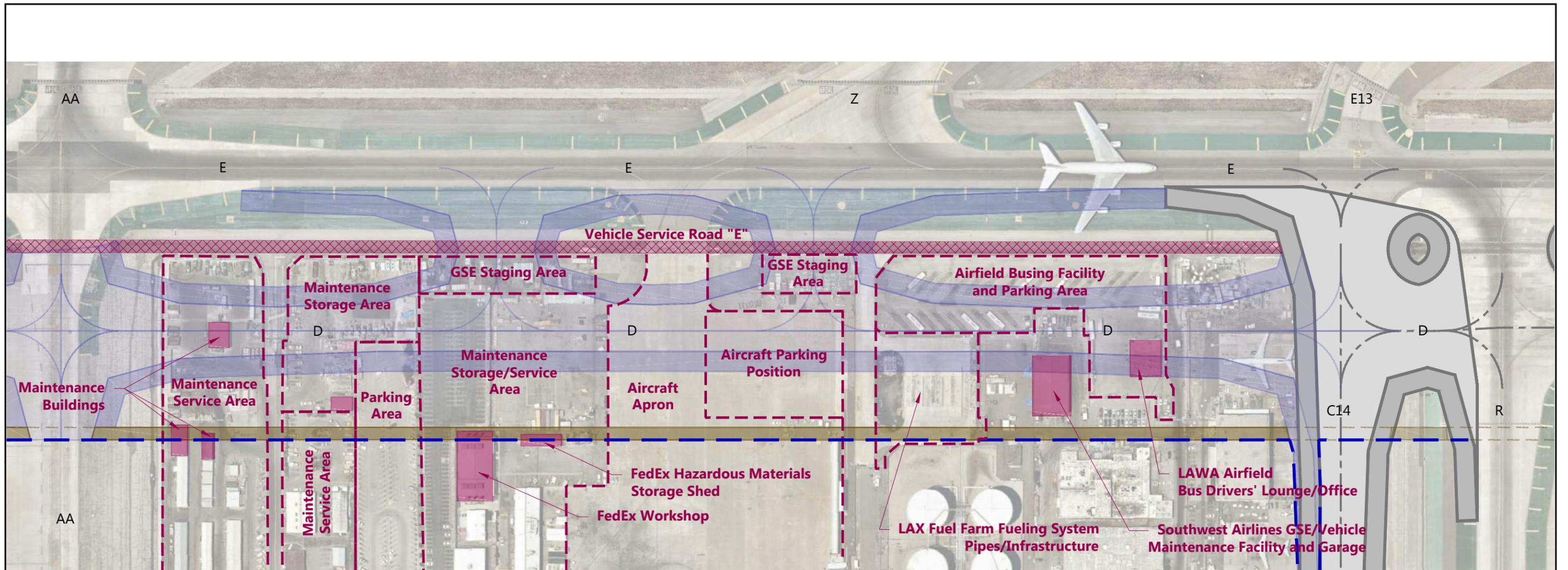
LEGEND

- Proposed ATMP Airfield Improvement
- Displaced Facility
- Displaced Facility - Building
- Displaced Facility - Vehicle Service Road
- Project Extents

GSE - Ground Support Equipment
 RON - Remain Overnight

Source: Ricondo & Associates, Inc., 2018.
 Prepared by: CDM Smith, December 2018.





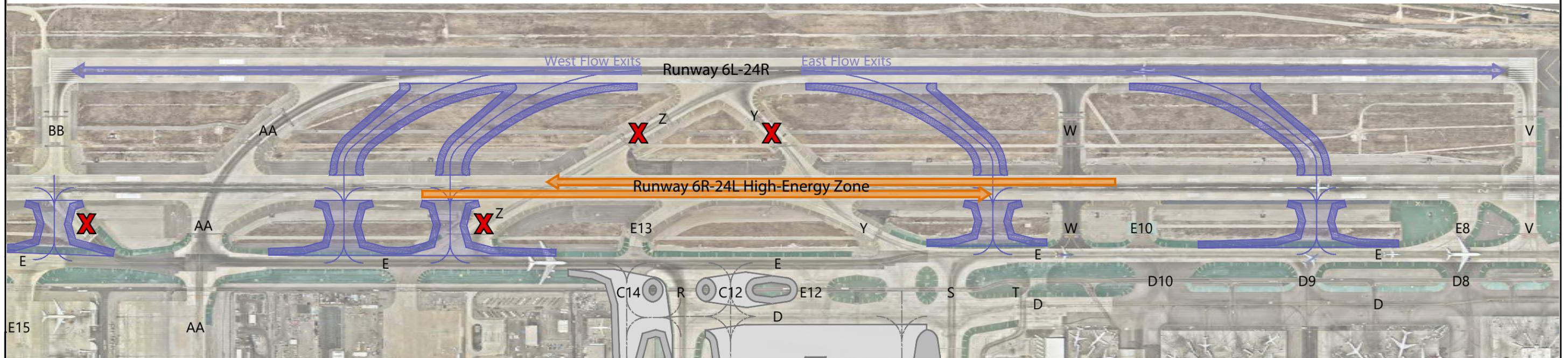
LEGEND

- Proposed ATMP Airfield Improvement
- Proposed Vehicle Service Road Improvement
- Approved Airfield Improvement not part of ATMP
- Displaced Facility
- Displaced Facility - Building
- Displaced Facility - Vehicle Service Road
- Project Extents

GSE - Ground Support Equipment
 LAWLA - Los Angeles World Airports
 LAX - Los Angeles International Airport

Source: Ricondo & Associates, Inc., 2018.
 Prepared by: CDM Smith, March 2019.



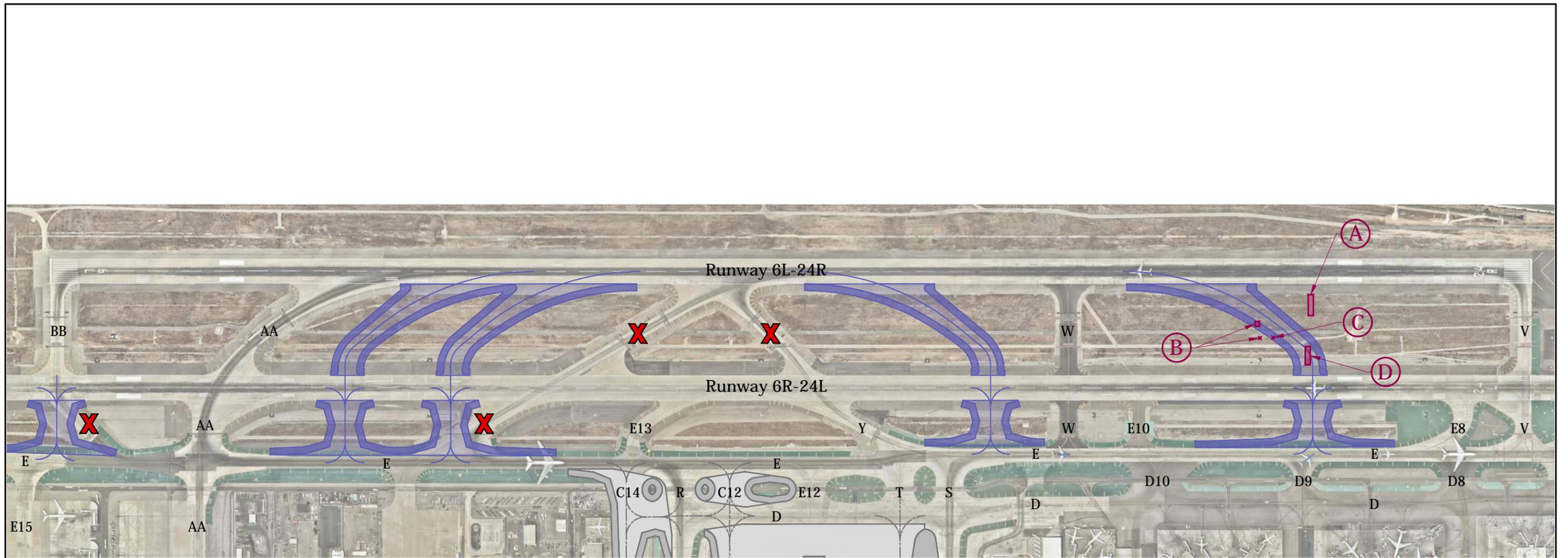


LEGEND

-  Proposed ATMP Airfield Improvement
-  Removed or Decommissioned Taxiway
-  Runway 6R-24L High-Energy Zone
(Approximate location of the West Flow and East Flow middle-third of the runway based on departure declared distances.)
-  Approved Airfield Improvement not part of ATMP

Source: Ricondo & Associates, Inc., 2018.
 Prepared by: CDM Smith, October 2018.





- Enabling Projects (Relocation of):
- (A) Runway 24R PAPI
 - (B) ASOS
 - (C) Wind Sock
 - (D) Runway 24L PAPI

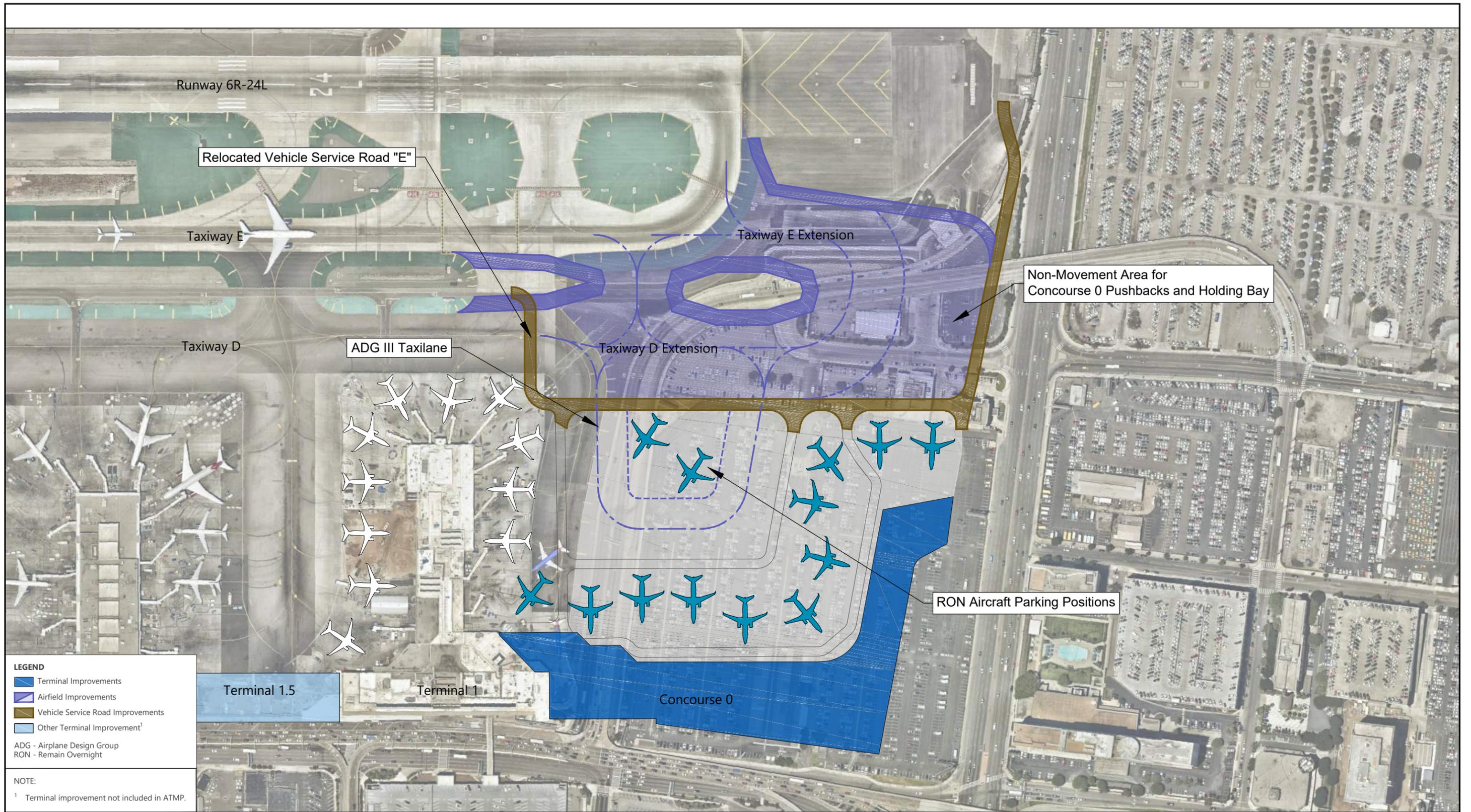
LEGEND

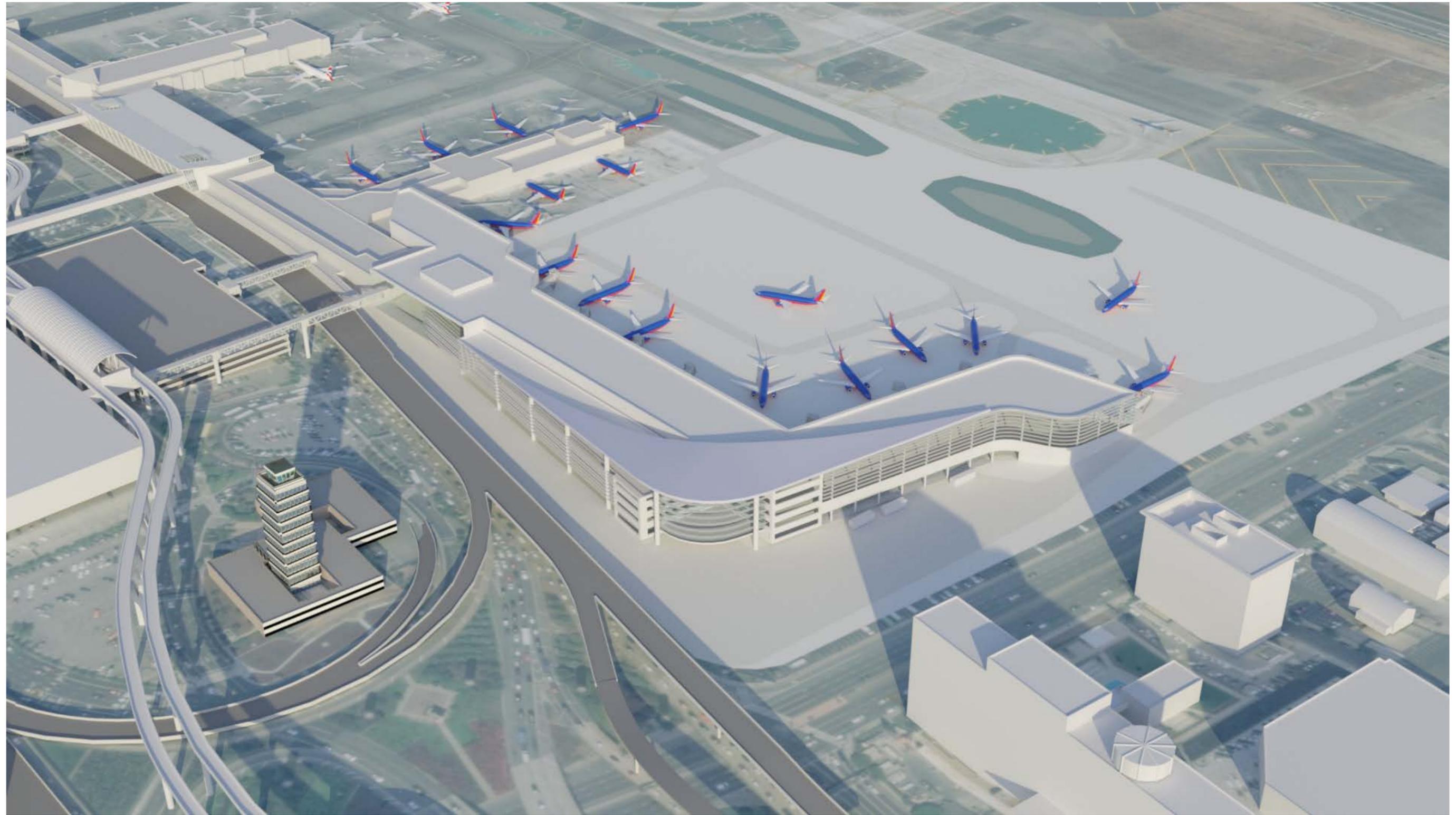
- Proposed ATMP Airfield Improvement
- Removed or Decommissioned Taxiway
- Displaced Facility (Enabling Projects)
- Approved Airfield Improvement not part of ATMP

ASOS - Automated Surface Observing System
PAPI - Precision Approach Path Indicator

Source: Ricondo & Associates, Inc., 2019.
Prepared by: CDM Smith, March 2019.







Source: Ricondo & Associates, Inc., 2019.
Prepared by: CDM Smith, March 2019.

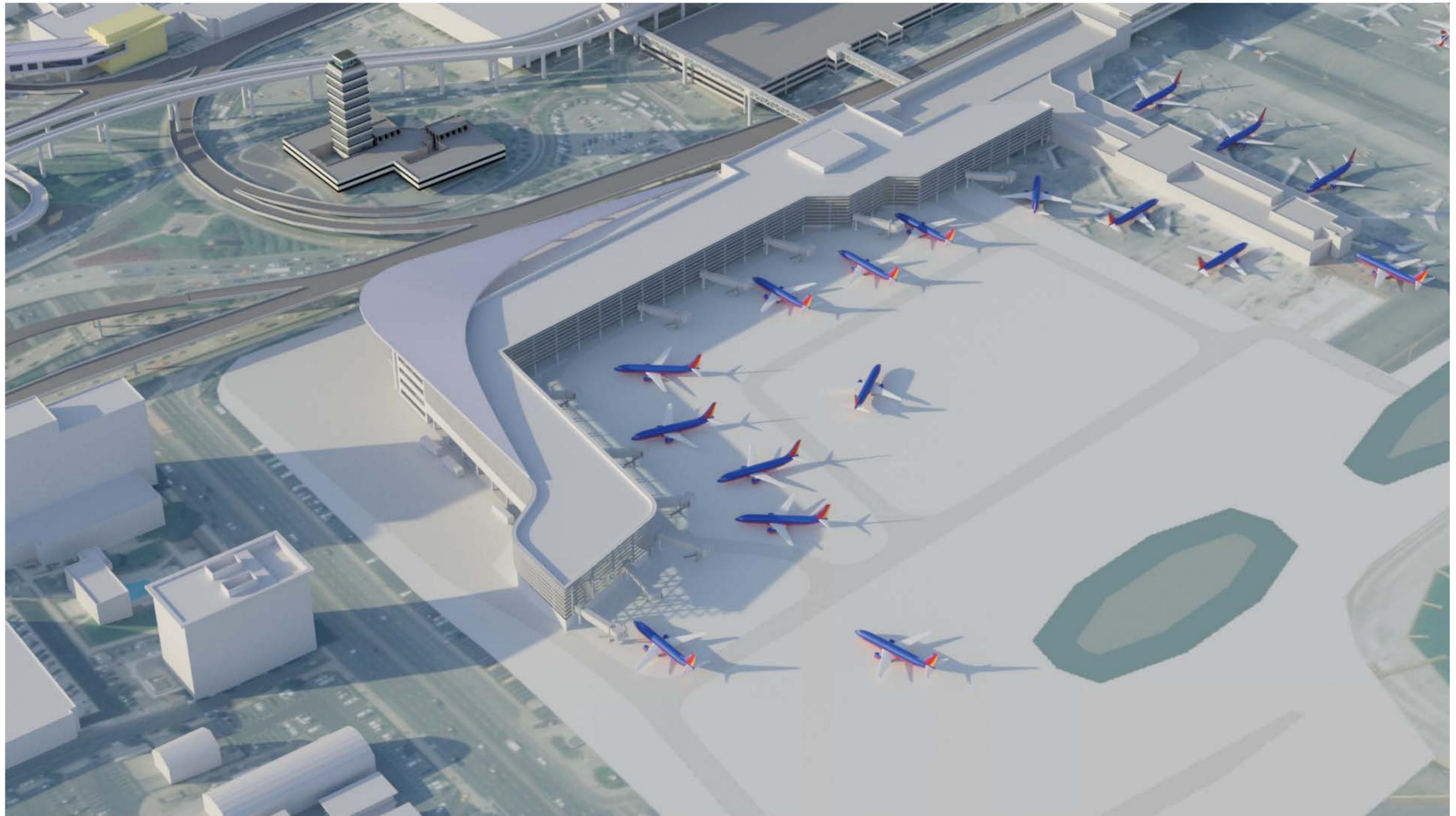
Not to Scale



LAX Airfield and Terminal Modernization Project

Concourse 0 Conceptual View – Landside

Figure
11



Source: Ricondo & Associates, Inc., 2019.
Prepared by: CDM Smith, March 2019.

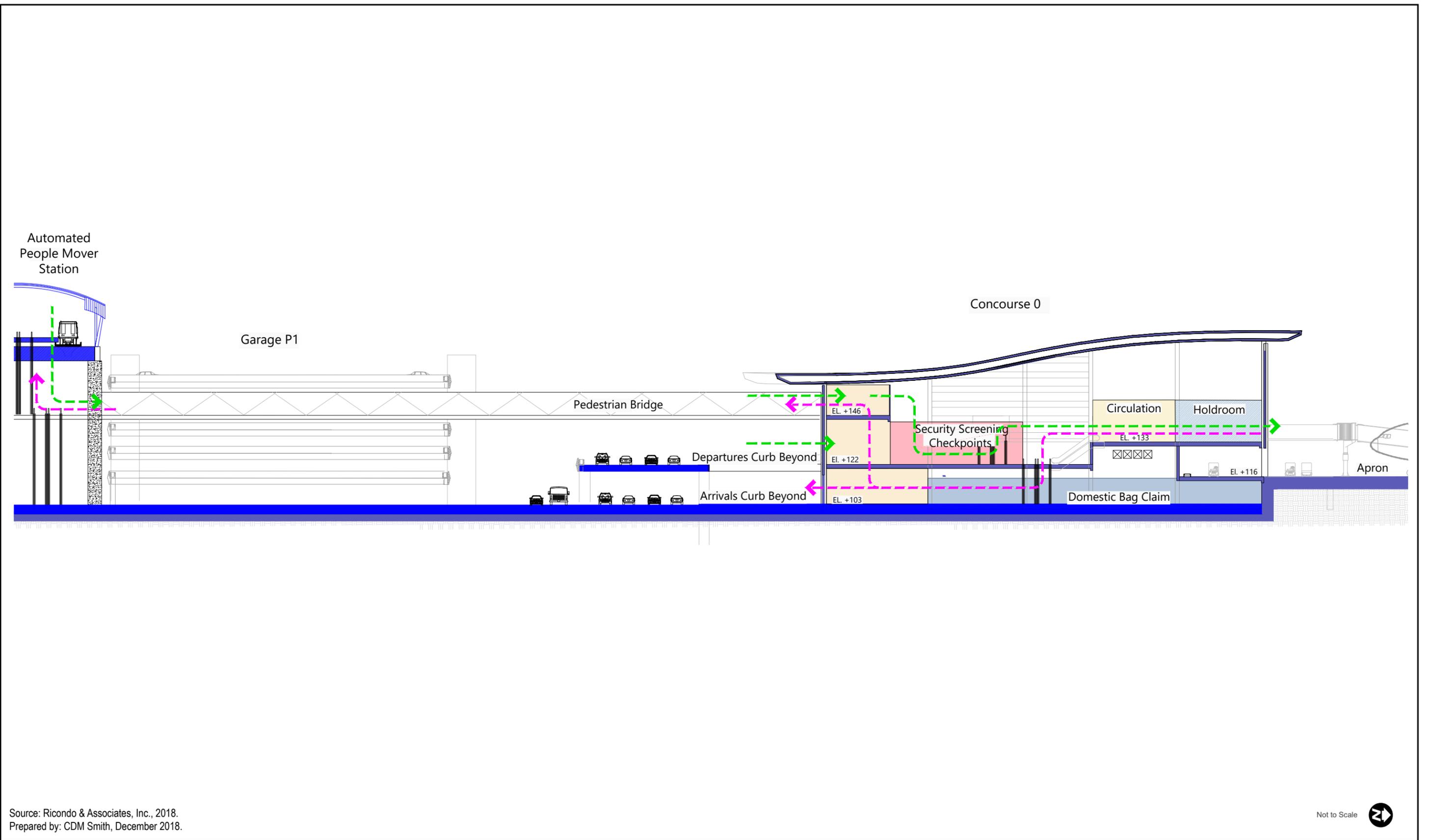
Not to Scale

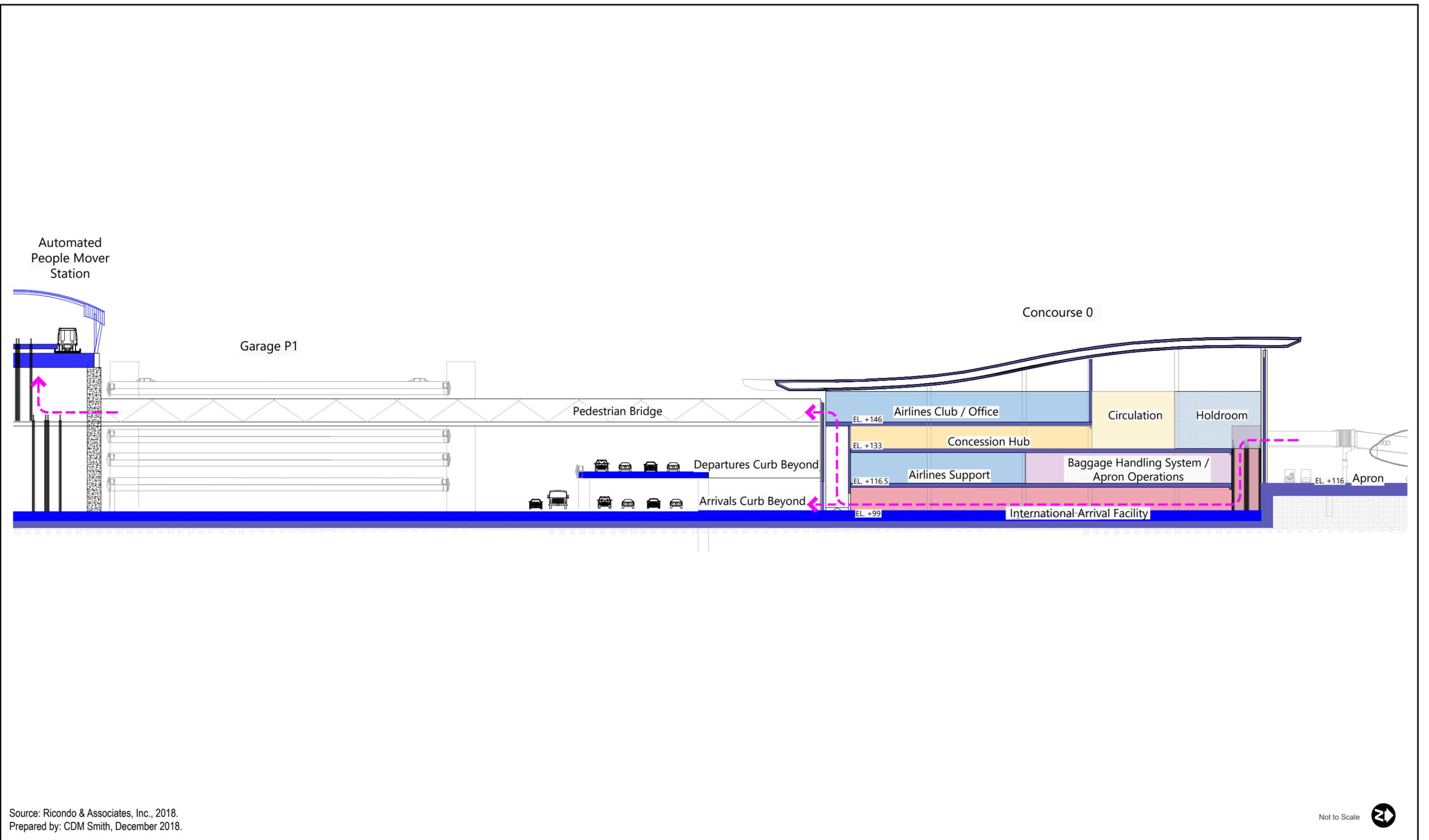


LAX Airfield and Terminal Modernization Project

Concourse 0 Conceptual View – Airside

Figure
12





- Enabling Projects
- ① Park One LAX*
 - ② LAX Police Headquarters and Vehicle Parking
 - ③ Vehicle Service Road "E" and Security Post 3
 - ④ 96th Street and Alverstone Avenue
 - ⑤ Building and Vehicle Parking
 - ⑥ Vehicle Parking

- LAMP Enabling Projects
- Ⓐ Sky Way / 96th Street Bridge*
 - Ⓑ Reliant Medical Center*

* Removal of these existing facilities would occur through projects separate from the Airfield and Terminal Modernization Project.



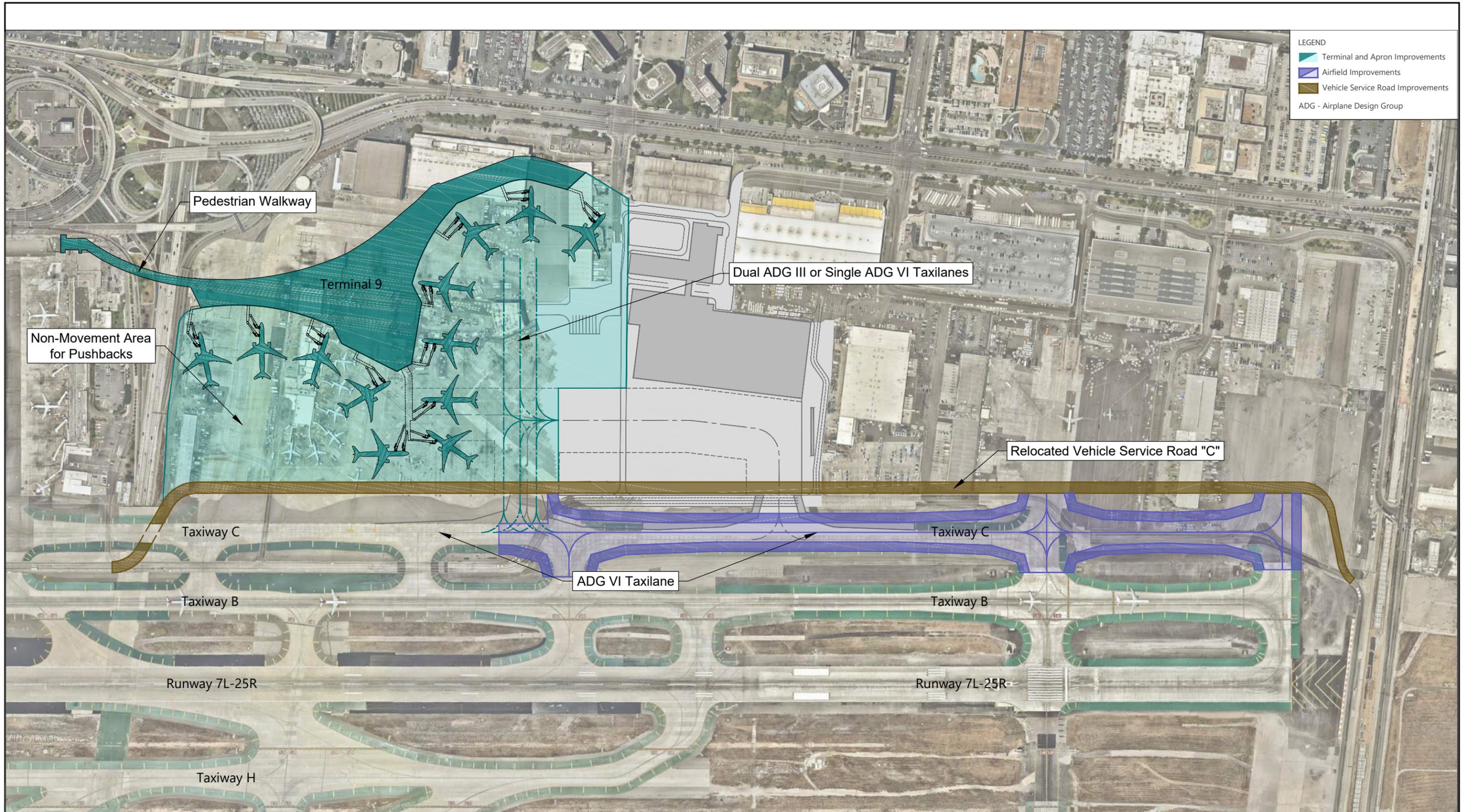
- LEGEND
- Displaced Facility
 - Displaced Facility - Building
 - - - Project Extents
 - - - LAMP Enabling Project

- NOTES:
- 1 Additional enabling projects, including utilities, may be identified through further analysis.
 - 2 LAMP - Landside Access Modernization Program
 - LAX - Los Angeles International Airport



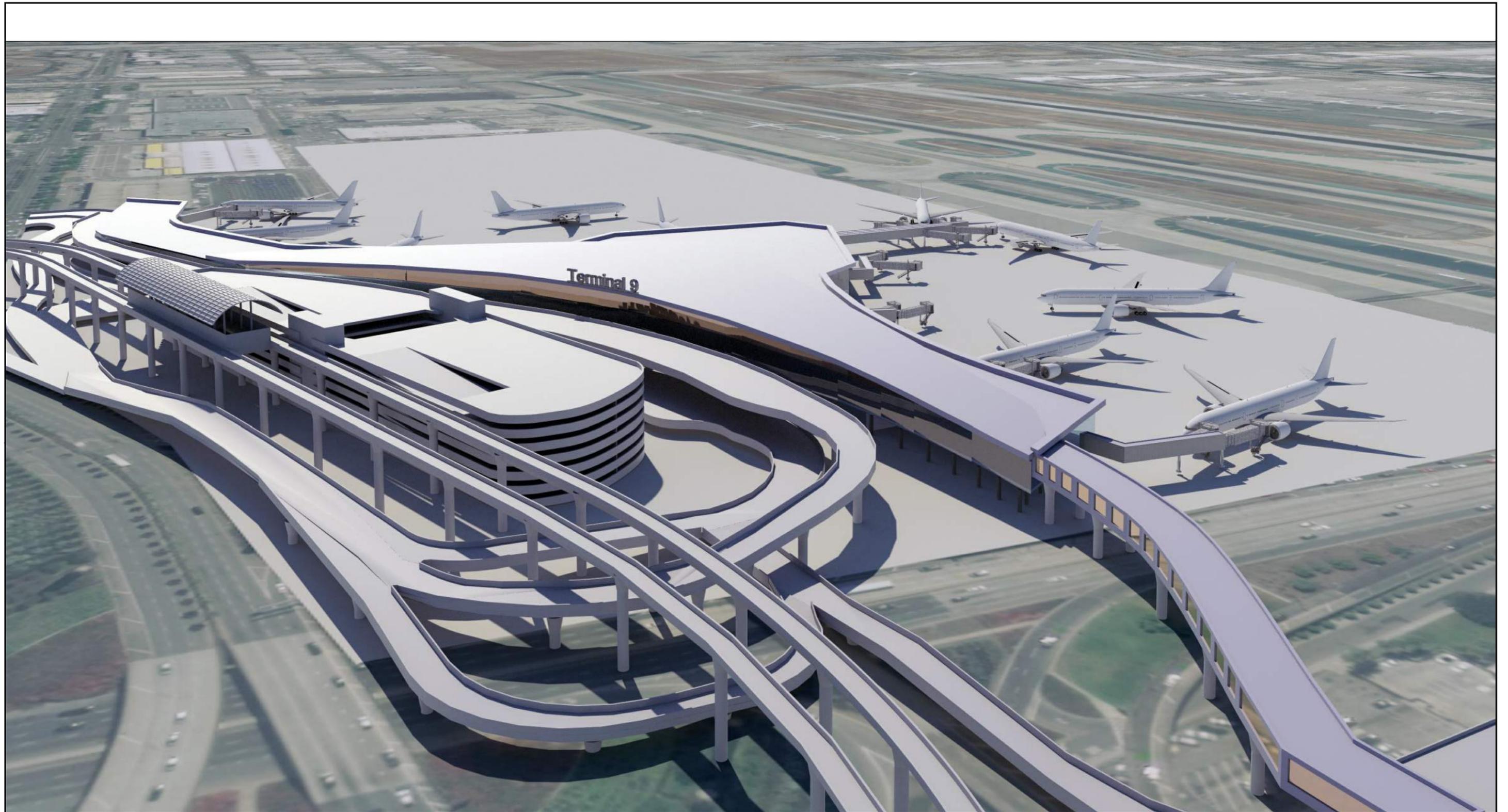
Source: Ricondo & Associates, Inc., 2018.
Prepared by: CDM Smith, March 2019.





Source: Ricondo & Associates, Inc., 2019.
 Prepared by: CDM Smith, February 2019.





Source: Ricondo & Associates, Inc., 2018.
Prepared by: CDM Smith, December 2018.

Not to Scale 



Source: Ricondo & Associates, Inc., 2018.
 Prepared by: CDM Smith, December 2018.

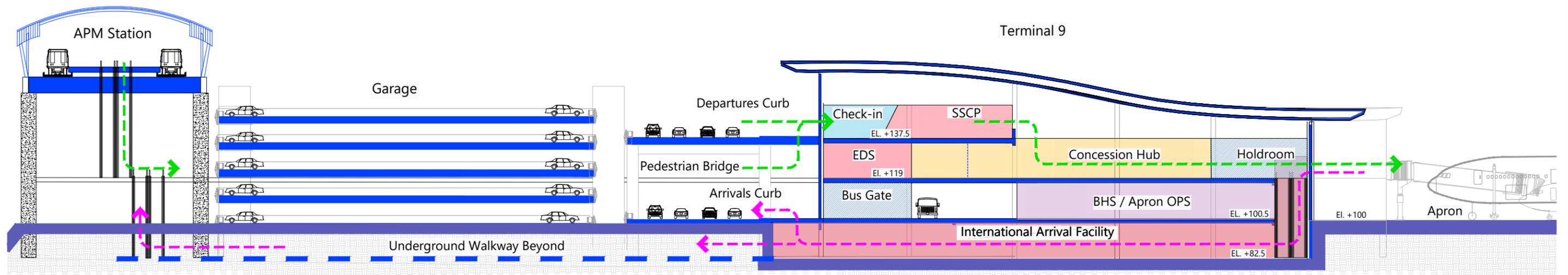
Not to Scale



LAX Airfield and Terminal Modernization Project

Terminal 9 Conceptual View - Airside

Figure
 18



LEGEND

- APM - Automated People Mover
- BHS - Baggage Handling System
- EDS - Explosive Detection System
- OPS - Operations
- SSCP - Security Screening Checkpoint

Source: Ricondo & Associates, Inc., 2018.
 Prepared by: CDM Smith, December 2018.

Not to Scale 

LEGEND

- - - Displaced Facility
- Displaced Facility - Building
- - - Project Extents
- - - LAMP Enabling Project

GSE - Ground Support Equipment
 LAMP - Landside Access Modernization Program
 LAX - Los Angeles International Airport

NOTE:

Additional enabling projects, including utilities, may be identified through further analysis.

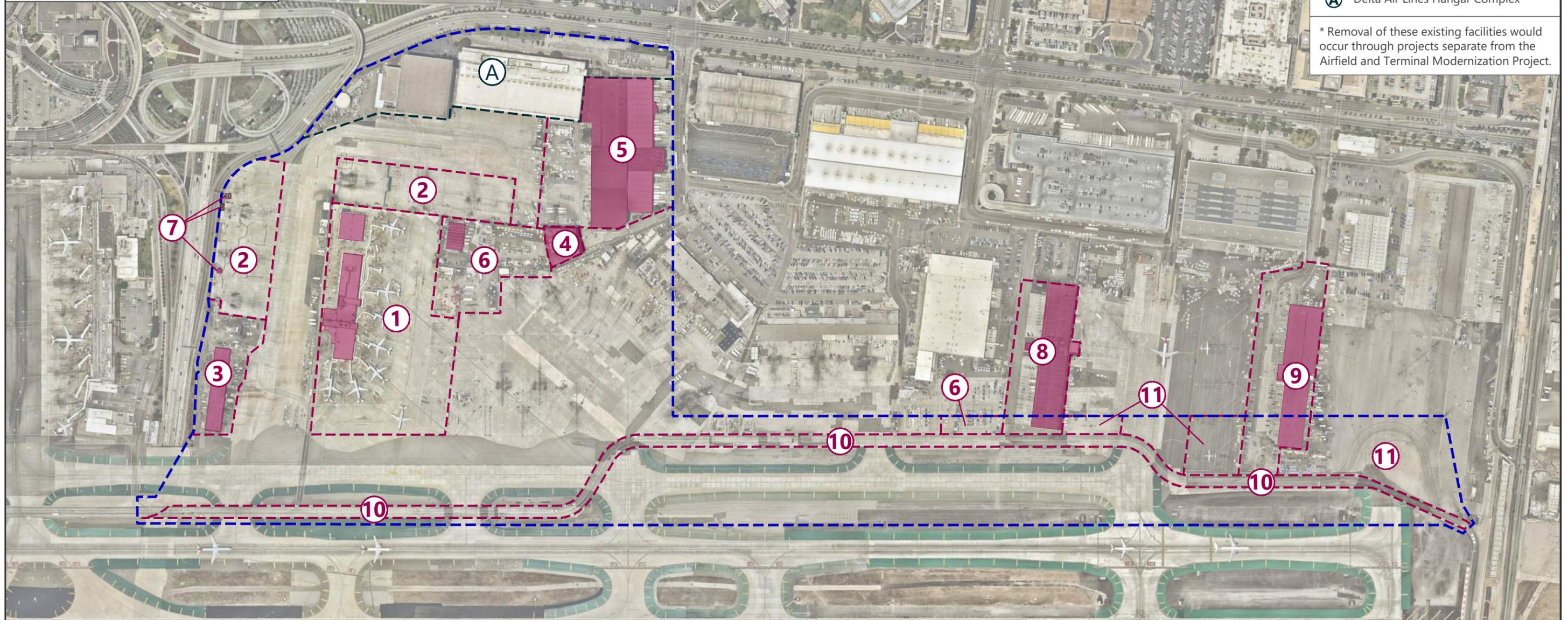
Enabling Projects

- | | |
|---|---|
| ① American Eagle Commuter Terminal | ⑦ Aircraft Maintenance Support Buildings |
| ② Remain Overnight and Maintenance Aircraft Parking | ⑧ Cargo Buildings |
| ③ Delta Air Lines GSE Building | ⑨ Air Freight Building #8 |
| ④ LAX Records Retention Building | ⑩ Vehicle Service Road "C" |
| ⑤ Mercury Air Cargo Group | ⑪ Remain Overnight, Cargo, and Maintenance Aircraft Parking |
| ⑥ Equipment Maintenance/Storage | |

LAMP Enabling Projects

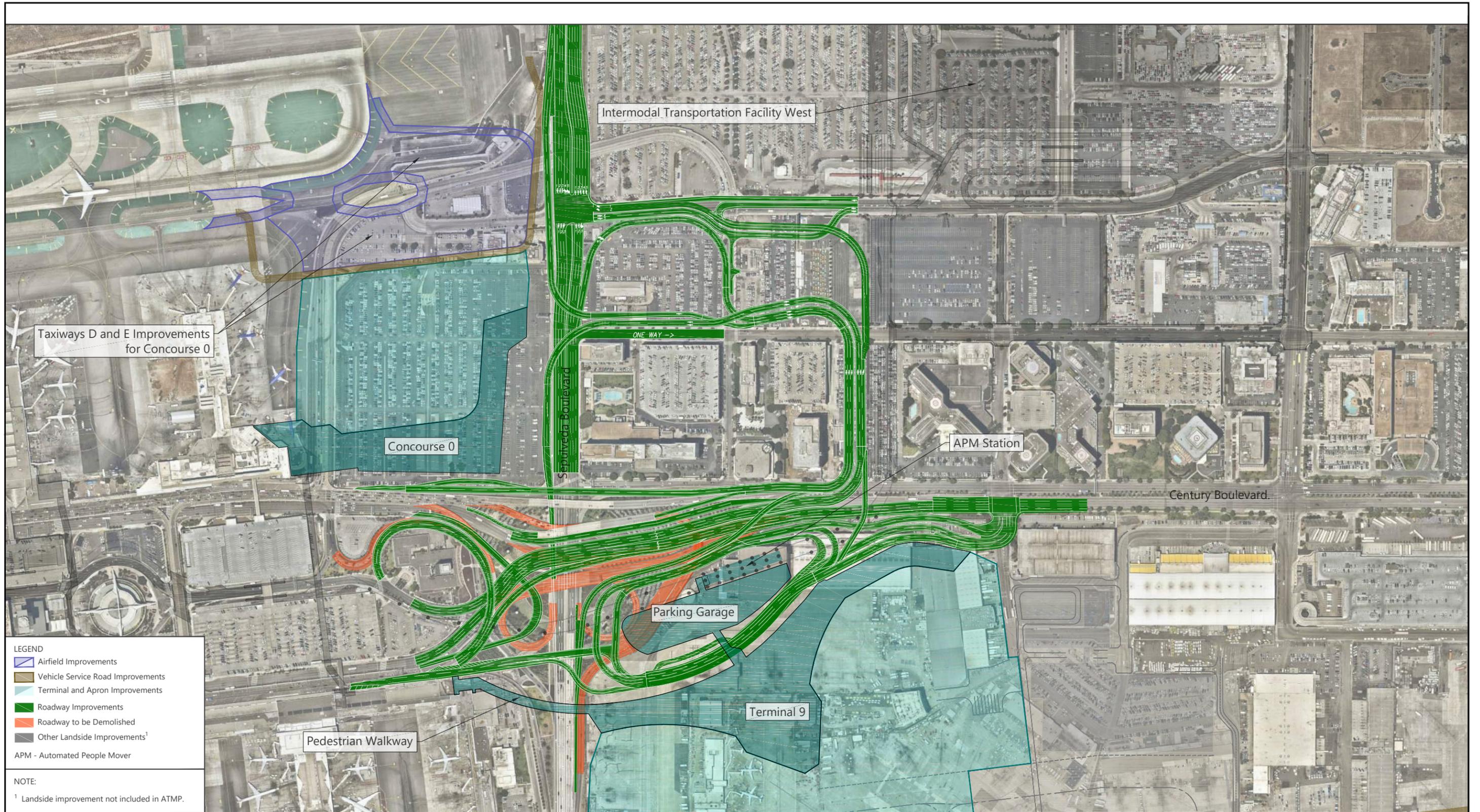
- Ⓐ Delta Air Lines Hangar Complex*

* Removal of these existing facilities would occur through projects separate from the Airfield and Terminal Modernization Project.



Source: Ricondo & Associates, Inc., 2018.
 Prepared by: CDM Smith, March 2019.





Source: Ricondo & Associates, Inc., 2018.
 Prepared by: CDM Smith, December 2018.



Source: CDM Smith, 2019.
Prepared by:
CDM Smith, March 2019.

Not to scale 

LAX Airfield and Terminal Modernization Project

View Looking North along Sepulveda Boulevard

Figure
22



Source: CDM Smith, 2019.
Prepared by:
CDM Smith, March 2019.

Not to scale 

LAX Airfield and Terminal Modernization Project

View Looking Northwest across Western Portion of T9 (Foreground) and C0 (Background)



Source: CDM Smith, 2019.
 Prepared by:
 CDM Smith, March 2019.

Not to scale 

LAX Airfield and Terminal Modernization Project

View Looking South along Sepulveda Boulevard

Figure
 24



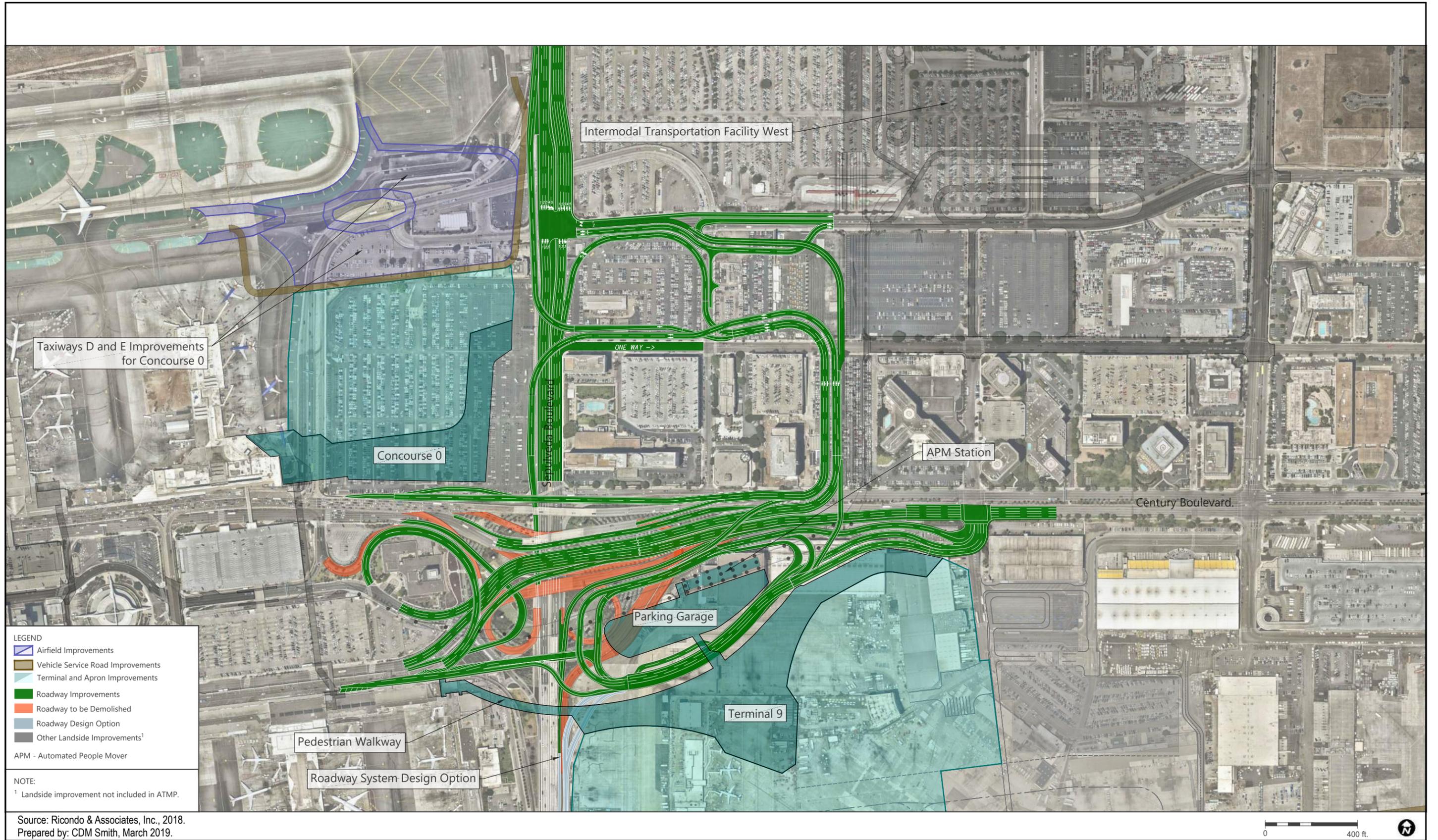
Source: CDM Smith, 2019.
Prepared by:
CDM Smith, February 2019.

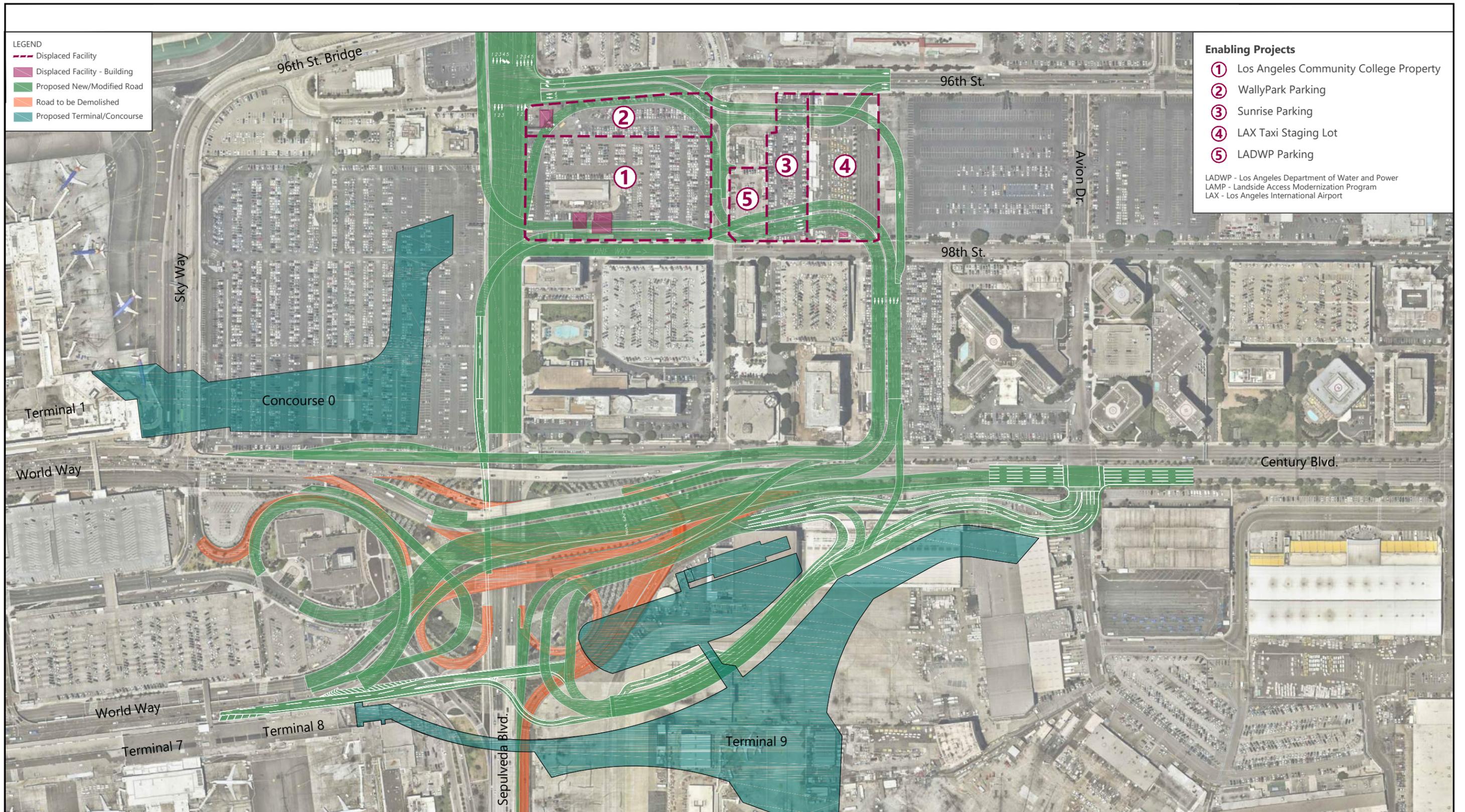
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LAX Airfield and Terminal Modernization Project

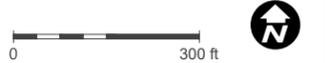
View Looking South with Roadway Improvements in Foreground and T9 in Background

Figure
25





Source: Ricondo & Associates, Inc., 2018.
 Prepared by: CDM Smith, December 2018.



CITY OF LOS ANGELES

OFFICE OF THE CITY CLERK
ROOM 615, CITY HALL
LOS ANGELES, CALIFORNIA 90012

CALIFORNIA ENVIRONMENTAL QUALITY ACT INITIAL STUDY AND CHECKLIST

(Article IV City CEQA Guidelines)

LEAD CITY AGENCY Los Angeles World Airports (LAWA)	COUNCIL DISTRICT Council District 11	DATE April 4, 2019
RESPONSIBLE AGENCIES South Coast Air Quality Management District, California Department of Transportation (Caltrans)		
PROJECT TITLE/NO. Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project		CASE NO. NP-19-001-AD
PREVIOUS ACTIONS CASE NO.	<input type="checkbox"/> DOES have significant changes from previous actions. <input type="checkbox"/> DOES NOT have significant changes from previous actions.	
PROJECT DESCRIPTION: LAWA proposes to implement airfield, terminal, and landside roadway improvements at LAX as part of LAWA's continuing commitment to maintain LAX as a world-class airport. The proposed project consists of several primary elements including airfield improvements that would 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 CTA and reduce congestion. Project elements associated with the proposed project are shown in Figures 3 and 4. The airfield improvements would occur within the north airfield and would include the westerly extension of Taxiway D in the western portion of the north airfield, the reconfiguration of runway exits from Runway 6L-24R, and enabling projects associated with these improvements. The terminal improvements would include the construction of Concourse 0 as an easterly extension of Terminal 1; construction of Terminal 9, a new passenger terminal located southeast of the Sepulveda Boulevard/Century Boulevard intersection, improvements and modifications to existing taxiways near Concourse 0 and Terminal 9 to facilitate aircraft access to and from the gates at those facilities, and enabling projects associated with these improvements. The landside improvements would be comprised of new arrival and departure roadways and a parking garage to support Terminal 9, an added station on the previously-approved LAX Automated People Mover line with a pedestrian connection to Terminal 9, a pedestrian corridor between Terminals 8 and 9 that would bridge across Sepulveda Boulevard, new roadway segments that would improve vehicle access into and out of the LAX CTA, and enabling projects related to these improvements. In conjunction with providing landside access to Terminal 9.		
ENVIRONMENTAL SETTING: The proposed project improvement areas are located within the northern and eastern portions of LAX. These areas consist of highly-developed land within and adjacent to a busy international airport. The land use setting around the project site is characterized by airport operations with commercial uses along Sepulveda Boulevard and Century Boulevard, and commercial uses, a Los Angeles Community College District educational facility, and vehicle parking (surface and structured parking) along 96th Street, 98th Street, and Vicksburg Avenue. West of the project area are the Los Angeles/El Segundo Dunes, a designated Ecologically Sensitive Habitat Area, and beyond the Dunes is the Pacific Ocean. The proposed airfield improvements are situated within a portion of the airport that includes paved airfield areas, airfield access roadways, remote gates, and other aviation-related uses, such as maintenance facilities and fuel storage facilities. The Concourse 0 site is occupied by a surface vehicle parking lot (Park One) and a groundwater remediation system to address past contamination beneath the site. The Terminal 9 site encompasses		

existing cargo and maintenance facilities, the LAX Records Retention Building, and an American Eagle commuter facility. The landside improvements would be located in proximity to several hotels (Hyatt Regency Los Angeles, H Hotel/Homewood Suites, Courtyard by Marriott), surface and structured parking facilities, the Los Angeles College Aircraft School, and other commercial uses. Also within the project improvement area is the entrance to LAX, located at World Way and Sepulveda Boulevard.

PROJECT LOCATION
 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. More specifically, the north airfield improvements would be situated south of Runway 6L-24R and between Pershing Drive on the west and Sepulveda Boulevard on the east. The south airfield improvements would be situated east of Sepulveda Boulevard and west of Aviation Boulevard, at Taxiway C. The terminal and landside improvements would generally be bound by Terminal 1 to the west, Airport Boulevard to the east, the approximate location where Lincoln Boulevard merges with Sepulveda Boulevard to the north, and the LAX south airfield to the south. LAX is situated within the City of Los Angeles, an incorporated city within Los Angeles County.

<p>PLANNING DISTRICT LAX Plan LAX Specific Plan Westchester-Playa del Rey Community Plan</p>	<p>STATUS: <input type="checkbox"/> PRELIMINARY <input type="checkbox"/> PROPOSED <input checked="" type="checkbox"/> ADOPTED</p>
--	---

<p>EXISTING ZONING LAX Zone: Airport Airside Subarea; LAX Zone: Airport Landside Subarea; Commercial C2-2 (acquisition parcels)</p>	<p><input checked="" type="checkbox"/> DOES CONFORM TO PLAN¹</p>
--	---

<p>PLANNED LAND USE & ZONE Airport-related airside and landside uses</p>	<p><input checked="" type="checkbox"/> DOES NOT CONFORM TO PLAN² <input type="checkbox"/> NO DISTRICT PLAN</p>
--	--

<p>SURROUNDING LAND USES North – Airport, Open Space, Residential, Recreational, and Commercial East – Airport, Commercial, Industrial, and Multi-Family Residential South – Airport, Commercial, Light Industrial, and Residential West – Airport, Open Space, Recreational</p>	
---	--

CONSULTATION WITH CALIFORNIA NATIVE AMERICAN TRIBES
 In accordance with Public Resources Code § 21080.3.1, LAWA sent a notification of consultation opportunity to the tribe that requested such notification pursuant to Public Resources Code § 21080.3.1(b)(1). No response from the tribe was received. In addition, LAWA contacted the Gabrielino Tongva Indians of California Tribal Council to discuss the results of the California Native American Heritage Commission’s Sacred Lands File record search.³ Based on discussions with the tribe, there is no information to suggest that there are known sacred resources or other tribal cultural resources that would be affected by the proposed project.

¹ The LAX Airfield and Terminal Modernization Project conforms to existing LAX Plan policies, but the existing LAX Plan and LAX Specific Plan would need to be amended to reflect adjustments to the LAX Specific Plan boundaries and to the Airport Landside Subarea and Airport Airside Subarea boundaries.

² The proposed project would require changes to the zoning and land use designations to properties that would be acquired.

³ Telephone conversation with Robert Dorame, Chairman, Gabrielino Tongva Indians of California Tribal Council, March 7, 2019.

DETERMINATION	
On the basis of this initial evaluation:	
<input type="checkbox"/> I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.	
<input type="checkbox"/> I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions on the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.	
<input checked="" type="checkbox"/> I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.	
<input type="checkbox"/> I find the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.	
<input type="checkbox"/> I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.	
	<i>CHIEF OF AIRPORT PLANNING II</i>
SIGNATURE	TITLE

EVALUATION OF ENVIRONMENTAL IMPACTS:

- 1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
- 2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
- 3) Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect may be significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.
- 4) "Negative Declaration: Less Than Significant With Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from "Earlier Analyses," as described in (5) below, may be cross-referenced).

-
- 5) Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
 - a. Earlier Analysis Used. Identify and state where they are available for review.
 - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
 - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
 - 6) Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
 - 7) Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
 - 8) This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
 - 9) The explanation of each issue should identify:
 - a. the significance criteria or threshold, if any, used to evaluate each question; and
 - b. the mitigation measure identified, if any, to reduce the impact to less than significance.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages. These issues will be further analyzed in the EIR to determine if, in fact, the impact is significant. If the impact is determined to be significant in the EIR, the EIR will further determine if feasible mitigation is available that can reduce the impact to less than significant.

<input type="checkbox"/> Aesthetics	<input checked="" type="checkbox"/> Greenhouse Gas Emissions	<input type="checkbox"/> Public Services
<input type="checkbox"/> Agriculture and Forestry Resources	<input checked="" type="checkbox"/> Hazards and Hazardous Materials	<input type="checkbox"/> Recreation
<input checked="" type="checkbox"/> Air Quality	<input type="checkbox"/> Hydrology and Water Quality	<input checked="" type="checkbox"/> Transportation
<input type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Land Use and Planning	<input type="checkbox"/> Tribal Cultural Resources
<input checked="" type="checkbox"/> Cultural Resources	<input type="checkbox"/> Mineral Resources	<input checked="" type="checkbox"/> Utilities/Service Systems
<input checked="" type="checkbox"/> Energy	<input checked="" type="checkbox"/> Noise	<input type="checkbox"/> Wildfire
<input type="checkbox"/> Geology and Soils	<input type="checkbox"/> Population and Housing	<input checked="" type="checkbox"/> Mandatory Findings of Significance

INITIAL STUDY CHECKLIST (To be completed by the Lead City Agency): Initial Study checklist is provided on the following pages.

PROPONENT NAME LAWA – Evelyn Quintanilla	PHONE NUMBER (800) 919-3766
PROPONENT ADDRESS 6053 Century Boulevard, Suite 1050, Los Angeles, California 90045	
AGENCY REQUIRING CHECKLIST Los Angeles World Airports	DATE SUBMITTED April 4, 2019
PROPOSAL NAME (If Applicable) LAX Airfield and Terminal Modernization Project	

ENVIRONMENTAL IMPACTS	(Explanations of all potentially and less than significant impacts are required to be attached on separate sheets)
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	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
I. AESTHETICS. Except as provided in Public Resources Code Section 21099, would the project:				
a. Have a substantial adverse effect on a scenic vista?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state or city-designated scenic highway?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
II. AGRICULTURE AND FORESTRY RESOURCES. Would the project:				
a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in the loss of forest land or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	
III. AIR QUALITY. Would the project:					
a.	Conflict with or obstruct implementation of the applicable South Coast Air Quality Management District plans?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (PM ₁₀ , PM _{2.5} , and O ₃ precursors [NO _x and VOC]) under an applicable federal or state ambient air quality standard?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Expose sensitive receptors to substantial pollutant concentrations?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d.	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
IV. BIOLOGICAL RESOURCES. Would the project:					
a.	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
V. CULTURAL RESOURCES. Would the project:				
a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Disturb any human remains, including those interred outside of dedicated cemeteries?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VI. ENERGY. Would the project:				
a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
VII. GEOLOGY AND SOILS. Would the project:				
a. Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury or death involving:				
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
ii. Strong seismic ground shaking?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iii. Seismic-related ground failure, including liquefaction?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
iv. Landslides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Result in substantial soil erosion or the loss of topsoil?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
d.	Be located on expansive soil, as defined in Table 18-1-B of the Los Angeles Building Code (2002), creating substantial direct or indirect risks to life or property?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e.	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f.	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
VIII. GREENHOUSE GAS EMISSIONS. Would the project:					
a.	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
IX. HAZARDS AND HAZARDOUS MATERIALS. Would the project:					
a.	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e.	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
f.	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g.	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
X. HYDROLOGY AND WATER QUALITY. Would the project:					
a.	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b.	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c.	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i.	result in substantial erosion or siltation on- or off-site?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
ii.	substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iii.	create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
iv.	impede or redirect flood flows?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e.	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
XI. LAND USE AND PLANNING. Would the project:					
a.	Physically divide an established community?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b.	Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
XII. MINERAL RESOURCES. Would the project:				
a.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				
b.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?				
XIII. NOISE. Would the project result in:				
a.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?				
b.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Generation of excessive groundborne vibration or groundborne noise levels?				
c.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?				
XIV. POPULATION AND HOUSING. Would the project:				
a.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Induce substantial unplanned population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				
b.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				
XV. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
a.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Fire protection?				

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
b. Police protection?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
c. Schools?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
d. Parks?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e. Other public facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XVI. RECREATION.

a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

XVII. TRANSPORTATION. Would the project:

a. Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Result in inadequate emergency access?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XVIII. TRIBAL CULTURAL RESOURCES. Would the project:

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:				
i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XIX. UTILITIES AND SERVICE SYSTEMS. Would the project:

a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

XX. WILDFIRE. If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact
c.	Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d.	Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
XXI. MANDATORY FINDINGS OF SIGNIFICANCE.					
a.	Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b.	Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c.	Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Explanation of Checklist Determinations

I. AESTHETICS.

Except as provided in Public Resources Code Section 21099, would the project:

a. Have a substantial adverse effect on a scenic vista?

No Impact. The project site is located primarily within the northern and eastern portions of LAX and is not a prominent feature in any scenic vista. Broad scenic views of the Santa Monica Mountains in the distance beyond LAX are available from some higher elevation locations to the south of LAX, including Interstate 105 (I-105) located approximately 0.60 mile south of the project site. The project site is part of the intervening development visible at a lower elevation between I-105 and the mountains. However, the project site is not visually distinct and does not detract from the mountain views. Moreover, the project site is not within the direct viewshed of north-facing residences in the City of El Segundo. The proposed project would improve northern runway exits and taxiways, which would not be distinguishable from the existing airfield. New elevated structures, including Concourse 0, Terminal 9, and new airport access roadways, would be consistent with surrounding airport-related structures. Thus, from a distance, the proposed project would remain visually indistinct from surrounding development and would not contribute to, or detract from, distant views of or from the Santa Monica Mountains from higher elevations to the south and would not alter existing long-range views of or from the Santa Monica Mountains. The Pacific Ocean is the only other scenic vista in the vicinity of the project site, and the primary vista-related sensitive uses are motorists traveling on Vista del Mar and residences located to the north and south of the airport property. Since the proposed new elevated structures would be located in the eastern/central portion of the airport, westerly views of the Pacific Ocean from residences to the north and south of the airport and from along Vista del Mar would not be affected by the proposed project. Potential views of the Pacific Ocean from elevated floors of hotels and office buildings at the west end of Century Boulevard are currently obstructed by intervening airport facilities. As such, the implementation of the proposed project would have no adverse effect on views of or from the Santa Monica Mountains or Pacific Ocean (i.e., scenic vistas). Therefore, the proposed project would not have a substantial adverse effect on a scenic vista. Implementation of the proposed project would have no impact related to a scenic vista and no further evaluation in the EIR is required.

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings, or other locally recognized desirable aesthetic natural feature within a state or city-designated scenic highway?

No Impact. The project site consists of highly-developed areas within and adjacent to a busy international airport. The project site is not located adjacent to or within the viewshed of a designated scenic highway. The nearest officially designated state scenic highway is approximately 21 miles northwest of the proposed project site (State Route 2, from approximately 3 miles north of Interstate 201 in La Cañada to the San Bernardino County Line).¹⁸ The nearest eligible state scenic highway (which is not officially designated by the state) is State Route 1,¹⁹ with a southerly starting point at

¹⁸ California Department of Transportation, *California Scenic Highway Mapping System website*, updated September 7, 2011. Available: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

¹⁹ The segment of State Route 1 (a portion of Sepulveda Boulevard) in the vicinity of the proposed elevated structures (at/near the eastern end of the CTA) is not a designated, or eligible for designation, scenic highway.

Lincoln and Venice Boulevards, approximately three miles from the project site, proceeding northwesterly to Point Mugu.²⁰ The southerly portion of this state-eligible scenic highway is a City-designated scenic highway. Vista del Mar, the nearest City-designated scenic highway, is located approximately 0.4 mile west of the most westerly project improvement site (i.e., Taxiway D extension west).²¹ The project site is not visible from the scenic highway-eligible portion of State Route 1 or Vista del Mar. There are no direct views to or from any scenic highways.

The Los Angeles/El Segundo Dunes, which are situated between Pershing Drive and Vista del Mar, are located approximately 375 feet west of the nearest proposed project improvement site (Taxiway D extension west). The Taxiway D extension west would be the only proposed improvement visible from the Dunes; however, the Taxiway D extension west would not substantially alter existing views from within the Dunes. The proposed project would not obstruct any views of the Dunes. The proposed project is not located within the viewshed of any other scenic resources or other locally recognized desirable aesthetic natural feature. Moreover, the project site does not contain any trees, rock outcroppings, or other locally recognized desirable aesthetic natural features within a City-designated scenic highway. The proposed project would not substantially damage scenic resources, including scenic highways.

Therefore, no impact on scenic resources within a state or City-designated scenic highway, including trees, landscaping, historical buildings, or other locally recognized desirable aesthetic natural features, would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

The potential for the proposed project to result in substantial adverse change in the significance of a historical resource is detailed below in Section V.a.

c. In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

No Impact. The project site consists of highly-developed areas within and adjacent to a busy international airport. The proposed project site includes paved airfield areas, landside and airport access roadways, a surface vehicle parking lot (Concourse 0 site), and airport-related structures (cargo and maintenance facilities, LAX Records Retention Building, and American Eagle commuter facility at the Terminal 9 site). The land use setting around the project site is characterized by airport operations, with commercial uses along Century Boulevard. Zoning is addressed in Item XI.b. As stated therein, the existing zoning for the on-airport portions of the project site is LAX Zone; off-site acquisition parcels that are not within the boundaries of the LAX Plan are zoned Commercial (C2-2). Although amendments would be required to parcels within the commercial zone, the proposed project is not inconsistent with the types of land uses allowed within that zone, or with the aesthetic characteristics of allowable land uses. The LAX Design Guidelines²² establish LAWA's comprehensive vision for the passenger experience at LAX. They are intended to integrate the design of new and existing facilities and to create an improved passenger experience that honors LAX's history and

²⁰ California Department of Transportation, *California Scenic Highway Mapping System website*, updated September 7, 2011. Available: http://www.dot.ca.gov/hq/LandArch/16_livability/scenic_highways/index.htm.

²¹ City of Los Angeles, Department of City Planning, *Mobility Plan 2035: An Element of the General Plan*, Appendix B: Inventory of Designated Scenic Highways and Guidelines, as adopted by City Council on September 7, 2016. Available: <http://planning.lacity.org/documents/policy/mobilityplnmemo.pdf>.

²² City of Los Angeles, Los Angeles World Airports, *LAX Design Guidelines*, March 24, 2017.

Mid-Century Modern architecture, while providing design guidance for new construction and major renovations as part of the modernization of LAX. The LAX Design Guidelines apply to all LAWA projects at LAX, including the proposed project. The LAX Design Guidelines specifically identify iconic elements within/at the entrance to the CTA (the Theme Building, the “original” [1961] control tower, the “new” [1996] control tower, the light pylons, and the Bradley West International Terminal) and require that new facilities respect these existing iconic elements and not attempt to mimic, repeat, or recreate them. The proposed project would be designed in accordance with the LAX Design Guidelines. Although the proposed new structures (i.e., Concourse 0, Terminal 9, and elevated airport access roadways) would be visually noticeable, these facilities would introduce new, modern features within the CTA that would be consistent with the airport’s image as a gateway to the City of Los Angeles. Construction of the proposed project would result in temporary changes to the visual character of the project area, as viewed from surrounding uses and nearby publicly-accessible vantage points. Construction activities would include demolition, site clearing, grading, and building construction. Typical construction equipment would include tractors, backhoes, scrapers, pavers, cranes, pile drivers, and other typical construction equipment. All construction activities near sensitive receptors would incorporate temporary construction barriers to screen construction activities and equipment. These temporary construction barriers, such as various screening, pedestrian canopies, and other appropriate buffer mechanisms, would be placed along the periphery of the construction areas to screen much of the construction activity along major public approach and perimeter roadways, such as Century Boulevard and Sepulveda Boulevard. Following completion of construction, the proposed improvements would be consistent with the aesthetics of the surrounding on- and off-airport land uses in terms of size, massing, and land use type. Further, as discussed above, the proposed project would not conflict with applicable zoning and would be consistent with other regulations governing scenic quality, including the LAX Design Guidelines. As such, there would be no impact and no further evaluation in the EIR is required.

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less Than Significant Impact. The project site is in an urban area with many existing sources of ambient lighting, including street lights, lighting of the airfield and other airport facilities, and adjacent commercial and industrial development. The proposed project would result in the introduction of new structures to the project site, including multi-story terminal and concourse facilities, airfield facilities, and elevated roadway facilities. These new uses would contribute new sources of lighting typical of a modern airport area, which currently contains moderate to high levels of ambient lighting. While the proposed project would introduce new sources of lighting, these introduced sources of lighting would be similar to existing terminal, airfield, and roadway lighting within and adjacent to LAX. The nearest light-sensitive uses that would be affected by these new sources of lighting and glare include hotel buildings along Century Boulevard. In accordance with the LAX Design Guidelines, the proposed project would incorporate various features throughout the new facilities, such as screening, street trees, landscape buffer zones, and other appropriate mechanisms to minimize lighting spillover. 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 these light-sensitive uses would be minimized. Furthermore, the proposed project would comply with the LAX Design Guidelines and the Century Boulevard Streetscape Plan^{23,24} by incorporating site lighting

²³ City of Los Angeles, *Century Boulevard Streetscape Plan*, May 2018. Available: <https://planning.lacity.org/complan/othrplan/OPAREA/CenturyBoulevard.pdf>.

²⁴ City of Los Angeles, *Los Angeles World Airports, LAX Design Guidelines*, March 24, 2017.

elements and other building materials that would contribute to a safe and inviting atmosphere without casting light into the night sky or adjacent properties. The proposed project would also comply with Los Angeles Municipal Code (LAMC) Section 93.0117, which prohibits any stationary exterior light source to cause a residential unit(s) to be either illuminated by more than two foot-candles of lighting intensity or receive direct glare from the light source.²⁵ Additionally, the operational sources of light and glare associated with the proposed project would comply with LAMC Section 12.50 to avoid hazards to aircrafts by limiting illumination within portions of the project site that fall within an airport hazard area.²⁶ Adherence to these standard construction practices and regulatory standards would ensure that light and glare impacts that may occur during construction of the proposed project would not adversely affect day or nighttime views in the area.

Construction activities associated with the proposed project would involve nighttime activities that would require lighting of work areas at the construction sites. Construction-related nighttime lighting would include lights on vehicles, perimeter lighting, and safety lighting. Construction equipment would not include large expanses of mirrors or reflective surfaces that could cause daytime glare impacts. The nearest light-sensitive uses that would be affected by proposed nighttime construction activities are hotel buildings along Century Boulevard. Construction of the proposed project would generate similar sources of light compared to existing conditions and would need to adhere to FAA guidance to avoid causing light impacts or glare to aircraft or air traffic controllers. The project site is surrounded by various commercial, light industrial, and airport uses generating sources of light typical of a highly developed area. Construction activities within the CTA would primarily occur during the nighttime hours (between 1 a.m. to 9 a.m.). Although construction activities outside the CTA would primarily occur during daylight hours (7 a.m. to 3 p.m.), some construction activities would occur during the nighttime (between the hours of 3 p.m. and 11 p.m.). However, construction activities would incorporate various buffer mechanisms, such as screened chain link fencing, existing vegetation features, or setbacks within each construction staging area near sensitive land uses, to shield any nighttime light from spilling over onto surrounding uses. As with project operations, construction activities would also be required to comply with LAMC Section 93.0117 and LAMC Section 12.50, which would ensure that light and glare that may occur during construction of the proposed project would not adversely affect day or nighttime views in the area.

Based on the above, the proposed project would not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area and no further evaluation in the EIR is required.

II. AGRICULTURE AND FORESTRY RESOURCES.

Would the project:

- a. Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?**
- b. Conflict with existing zoning for agricultural use, or a Williamson Act contract?**

²⁵ City of Los Angeles, Los Angeles Municipal Code, Chapter IX, Article 3, Section 93.0117, *Outdoor Lighting Affecting Residential Property*.

²⁶ City of Los Angeles, Los Angeles Municipal Code, Chapter I, Article 2, Section 12.50, *Airport Approach Zoning Regulations*.

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- c. **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?**
 - d. **Result in the loss of forest land or conversion of forest land to non-forest use?**
 - e. **Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use?**

No Impact. The project site is located within a developed airport and is surrounded by airport uses and urbanized areas. There are no agricultural resources or operations at the project site or surrounding areas, including prime or unique farmlands or farmlands of statewide local importance. Further, there are no Williamson Act contracts in effect for the project site or surrounding areas.²⁷ The proposed project would represent a continuation of the current airport-related uses and would not convert farmland to non-agricultural use nor would it result in any conflicts with existing zoning for agricultural use or a Williamson Act contract.

There are no forest land or timberland resources or operations within the vicinity of the project site, including timberland zoned Timberland Production. The proposed project would be consistent with the current airport-related uses and would not convert forest land or timberland to non-forest. Therefore, no impacts to agricultural or forest land or timberland resources would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

III. AIR QUALITY.

Would the project:

- a. **Conflict with or obstruct implementation of the applicable South Coast Air Quality Management District plans?**
- b. **Result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (PM₁₀, PM_{2.5}, and O₃ precursors [NO_x and VOC]) under an applicable federal or state ambient air quality standard?**
- c. **Expose sensitive receptors to substantial pollutant concentrations?**

Potentially Significant Impact. Air pollutant emissions associated with construction and operation of the proposed project may exceed the SCAQMD CEQA significance thresholds. The EIR will evaluate whether construction or operation of the proposed project would: (1) conflict with or obstruct implementation of the applicable SCAQMD plans; (2) result in a cumulatively considerable net increase of any criteria pollutant for which the air basin is non-attainment (PM₁₀, PM_{2.5}, and O₃ precursors [NO_x and VOC]) under an applicable federal or state ambient air quality standard; and/or (3) expose sensitive receptors to substantial pollutant concentrations. The construction analysis will consider emissions from construction equipment, haul trucks, and construction worker commuting trips; fugitive emissions of volatile organic compounds (VOCs) from architectural coating; and fugitive dust from soil handling, grading, and unpaved roads. The operational analysis will focus on emissions from

²⁷ City of Los Angeles, Department of City Planning, *Conservation Element of the City of Los Angeles General Plan*, Exhibit B2, SEAs and Other Resources, January 2001.

aircraft, auxiliary power units (APUs),²⁸ ground support equipment (GSE),²⁹ vehicle exhaust, and stationary sources (e.g., emergency generators and fixed combustion equipment, such as space and water heaters that would provide warm air and hot water to Concourse 0 and Terminal 9).

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

No Impact. The use of diesel equipment during construction would generate near-field odors. Diesel equipment emits a distinctive odor that may be considered offensive to certain individuals. The closest sensitive receptors to the project site are hotels to the north and east on the north side of Century Boulevard between Sepulveda Boulevard and Avion Drive. The Hyatt Regency Los Angeles International Airport is located approximately 150 feet east of the proposed Concourse 0 construction area, approximately 450 feet north of the proposed Terminal 9 access roadways/parking garage, and approximately 25 feet from the proposed landside access improvements. The Sheraton Gateway Los Angeles Hotel is located approximately 1,500 feet east of the proposed Concourse 0 construction area, approximately 225 feet north of the proposed Terminal 9 access roadways, and approximately 1,300 feet from the proposed landside access improvements. Finally, the LAX Crowne Plaza Hotel is located approximately 2,100 feet east of the proposed Concourse 0 construction area, approximately 400 feet northeast of the proposed Terminal 9 access roadways, and approximately 700 feet northeast from the proposed landside access improvements. Due to the temporary nature of construction activities, combined with variabilities in wind speed and direction as related to the dispersion of construction emissions and distances to nearby receptors, odors from construction-related diesel exhaust would not affect a substantial number of people. The project site is located at LAX, which is characterized by airport operations, including aircraft operations, passenger processing, and vehicular movement. The proposed project would result in the continuation of airport operations consistent with existing aircraft activity, passenger processing, and vehicular movement at LAX and would not notably change existing odors at or in the vicinity of the project site. Moreover, the proposed project would not result in any other emissions not previously addressed in this Initial Study that would adversely affect a substantial number of people. Therefore, operation of the proposed project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people and no further analysis in the EIR is required.

IV. BIOLOGICAL RESOURCES.

Would the project:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

No Impact. The project site is located in highly-developed areas within LAX that are devoid of biological resources, with the exception of ornamental trees located along the perimeters of the Concourse 0 and Terminal 9 sites, street trees along the landside access roadways, and isolated landscape pockets along airport access roadways at Century and Sepulveda Boulevards. While other areas within the airport boundary contain plant and animal species as well as habitats identified as sensitive, as further

²⁸ An APU is a small, on-board engine that operates to provide power to an aircraft for lights and ventilation while it is parked at the gate when the main engines are off.

²⁹ GSE are surface vehicles used to service a flight while an aircraft is parked at a gate, including baggage tugs, lavatory carts, and push-back tractors.

described below, no sensitive plant or animal species have been identified on or near the project site. Therefore, the proposed project would have no impacts to candidate, sensitive, or special status species nor to habitats on which they depend and no further evaluation in the EIR is required.

- b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in the City or regional plans, policies, or regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?**
- c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?**

No Impact. There are no riparian/wetland areas or wildlife movement corridors at or near the project site. The closest riparian/wetland area is within Argo Channel, approximately 550 feet north of the project site. Therefore, no impacts to any riparian or other sensitive natural community or to any state or federally protected wetlands would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

- d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?**

Less Than Significant Impact. Approximately 80 non-native ornamental trees, ranging in height from approximately 20 feet to 60 feet, are located within the Concourse 0 site, and approximately 100 non-native ornamental trees, ranging in height from approximately 20 feet to 80 feet, are located along the northern perimeter of the Terminal 9 site. Approximately 150 non-native ornamental trees, ranging in height from approximately 20 feet to 60 feet, are located along the landside access roadways (i.e., along 96th Street, 98th Street, Century Boulevard, Vicksburg Avenue, and the entrance of LAX at World Way).³⁰ The trees associated with the proposed Concourse 0 and Terminal 9 project elements would be removed as part of the proposed project. The street trees associated with proposed landside access improvements may be trimmed and/or removed and replaced. Ornamental trees may be used for nesting by raptors or birds. Removal/trimming of such trees would be conducted in compliance with the Migratory Bird Treaty Act and California Fish and Game Code Sections 3503, 3503.5, 3511, and 3513 to protect migratory or nesting birds or raptors. Therefore, the proposed project would not interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. With compliance with the Migratory Bird Treaty Act and the California Fish and Game Code, impacts to biological resources would be less than significant and no further evaluation in the EIR is required.

- e. Conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?**

No Impact. There are no native trees, including trees protected by City of Los Angeles Ordinance No. 177404 (i.e., oak trees indigenous to California [excluding Scrub Oak], Southern California Black Walnut, Western Sycamore, or California Bay) at or adjacent to the project site.^{31,32} Should ornamental

³⁰ Glenn Lukos Associates, *Non-Protocol Tree Survey, LAX Airfield and Terminal Modernization Project, Los Angeles, World Airport, Los Angeles County, California*, March 2019.

³¹ City of Los Angeles, *Ordinance No. 177,404, Protected Tree Relocation and Replacement*, effective April 23, 2006.

³² Glenn Lukos Associates, *Non-Protocol Tree Survey, LAX Airfield and Terminal Modernization Project, Los Angeles, World Airport, Los Angeles County, California*, March 2019.

street trees need to be removed, such removal would be subject to permitting requirements for street tree removal under Los Angeles Municipal Code, Chapter VI, Sections 62.169 and 62.170.³³ Removal of ornamental trees that are not within a public right-of-way (e.g., trees on the Park One site or within the northerly portion of the Terminal 9 improvement area south of the W. Century Boulevard right-of-way) would not be subject to the permitting requirements under the City’s Municipal Code. Therefore, the proposed project would not conflict with any local policies or ordinances protecting biological resources, such as tree preservation policy or ordinance, and no further evaluation in the EIR is required.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

No Impact. There is no adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan that includes the project site. The Dunes Specific Plan Area (i.e., Los Angeles/El Segundo Dunes), a designated Los Angeles County Significant Ecological Area, is located in the western portion of LAX, approximately 375 feet west of the westernmost boundary of the project site (Taxiway D extension west), opposite Pershing Drive. Construction activities for the Taxiway D extension west project element would be entirely on existing paved areas and would not result in any direct or indirect impacts to sensitive habitat/species within the Dunes. As it is 375 feet west of the westernmost boundary of the project site, the Dunes area is well removed from the remainder of the project site and would not be affected by the proposed project. Therefore, the proposed project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan and no further evaluation in the EIR is required.

V. CULTURAL RESOURCES.

Would the project:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?

Potentially Significant Impact. In conjunction with preparation of the EIR for LAMP, a comprehensive inventory and assessment of historical resources on and near LAWA property within the LAMP study area was completed. The LAMP historic resources study included evaluation of structures to determine if they were listed or eligible for listing as an historic resource under the National Register of Historic Places or the California Register of Historical Resources, or as a City of Los Angeles Historic-Cultural Monument. Structures that are listed or eligible for listing within any of those three categories are considered to be “historically significant” pursuant to Section 15064.5 of the State CEQA Guidelines. Of the historic structures identified in the LAMP evaluation, one resource, the Flying Tiger Line World Headquarters, is located in proximity to the Taxiway D extension west project component, and four are located near the roadway system improvements proposed east of the CTA, including the 1961 Airport Traffic Control Tower, the Aircraft School Property located at 9700 S. Sepulveda Boulevard, the Union Savings and Loan building located at 9800 S. Sepulveda Boulevard, and the McCulloch Building located at 6151 W. Century Boulevard. Although one additional historical resource, specifically the Intermediate Terminal Facilities at 6000-6016 and 6020-6024 Avion Drive, is located at the eastern edge of the proposed Terminal 9 site, this historical resource will be removed in actions that are

³³ City of Los Angeles, Los Angeles Municipal Code, Chapter VI, Article 2, Section 62.169, *Permit Required to Plant in Streets*, and 62.170, *Conditional Permit to Remove or Destroy Trees*.

separate from, and independent of, the proposed project.³⁴ **Figure 28** delineates the locations of the five subject historical resources and **Table 3** provides basic information about each resource (additional information about each resource is provided in Appendix H, *Historic Resources Technical Report*, of the LAMP Draft EIR).^{35,36}

Based on preliminary engineering design plans prepared for the proposed roadway improvements, none of the four historical resources located nearby would be directly impacted by the proposed project. However, given the close proximity of these resources to the proposed roadway improvements, there is the potential for indirect impacts, such as the potential for structural damage from construction-related vibration occurring nearby.

Based on the above, the EIR will evaluate whether the proposed project would cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines Section 15064.5.

Table 3 Eligible Historical Resources within the Historical Resources Areas of Investigation						
Map ID No. (Figure 28)	Property	Location	Year Built	NR	CR	LAHCM
1	Flying Tiger Line World Headquarters	West of CTA	1965	Ineligible	Eligible	Eligible
2	1961 Airport Traffic Control Tower ¹ 1 World Way	CTA	1961	Ineligible	Ineligible	Eligible
3	Union Savings and Loan 9800 S. Sepulveda Boulevard	Outside CTA	1964	Ineligible	Eligible	Eligible
4	Aircraft School Property 9700 S. Sepulveda Boulevard	Outside CTA	1941–1945	Eligible	Eligible	Eligible
5	The McCulloch Building 6151 W. Century Boulevard	Outside CTA	1964	Eligible	Eligible	Eligible

Source: City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014)*, Appendix H, Historic Resources Technical Report, Prepared by Historic Resources Group, September 2016. Available: <https://cloud1lawa.app.box.com/s/7ggkdv7n7nbzvesasxnb6a6kr4ytew7d>.

Notes: NR = National Register of Historic Places; CR = California Register of Historical Resources; LAHCM = Los Angeles Historic-Cultural Monument.

¹ Due to extensive alteration of the 2-story Administration Building portion and alterations to the Tower portion, the building no longer retains integrity of design, setting, materials, or workmanship and therefore does not retain sufficient integrity to be eligible for listing in the National Register under Criteria A and C. Given the overall alteration of its architectural design, the building is also not eligible for listing in the California Register under Criterion 1 or 3.

³⁴ The Intermediate Terminal Facilities at 6000-6016 and 6020-6024 Avion Drive will be removed as part of the United Airlines East Aircraft Maintenance and GSE Project (see Project 6 listed in Table 4 in Section XXI.b [cumulative impacts discussion]). The United Airlines East Aircraft Maintenance and GSE Project was approved by the LAWA Board of Airport Commissioners on November 1, 2018.

³⁵ The LAMP EIR identified 13 historical resources within the historical resources areas of investigation for LAMP. One of these resources, a Quonset Hut formerly located at 6030 Avion Drive, was subsequently relocated and is no longer located in proximity to the proposed Airfield and Terminal Modernization Project site.

³⁶ City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014)*, Appendix H, Historic Resources Technical Report, Prepared by Historic Resources Group, September 2016. Available: <https://cloud1lawa.app.box.com/s/7ggkdv7n7nbzvesasxnb6a6kr4ytew7d>.

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

Less Than Significant Impact. The LAX Master Plan Final EIR identified 36 previously recorded archaeological sites within a radius of approximately two miles of LAX, including eight sites located on LAX property.³⁷ None of the eight sites identified on LAX property are located within the boundaries of the project site or in the immediate vicinity. Results of the records search conducted for LAMP from the South Central Coastal Information Center indicated no archaeological resources have been recorded at or within the immediate vicinity of the proposed project site.³⁸ The project site is a highly disturbed area that has long been, and is currently being, used for airport uses. Any resources that may have existed on the site at one time are likely to have been displaced and, as a result, the overall sensitivity of the site with respect to buried resources is low. While discovery of archaeological resources in artificial fill deposits within the project area is unlikely, proposed excavations that would occur below the fill levels could impact previously unknown buried archaeological resources that fall within the definition of historical resources or unique archaeological resources. Operation of the proposed project would not have the potential to impact archaeological resources.

LAWA has developed and adopted plans, policies, and procedures that address potential impacts to archaeological resources, which are documented in LAWA's Archaeological Treatment Plan (ATP).³⁹ LAWA requires all construction projects at LAX to comply with the ATP and will apply this requirement to the proposed project. With implementation of the ATP, monitoring for the presence of previously-unknown archaeological resources would occur during construction, when warranted, and discoveries of archaeological resources would be handled in accordance with the ATP and with all applicable laws and regulations. As a result, impacts of the proposed project on archaeological resources would be less than significant and no further evaluation in the EIR is required.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

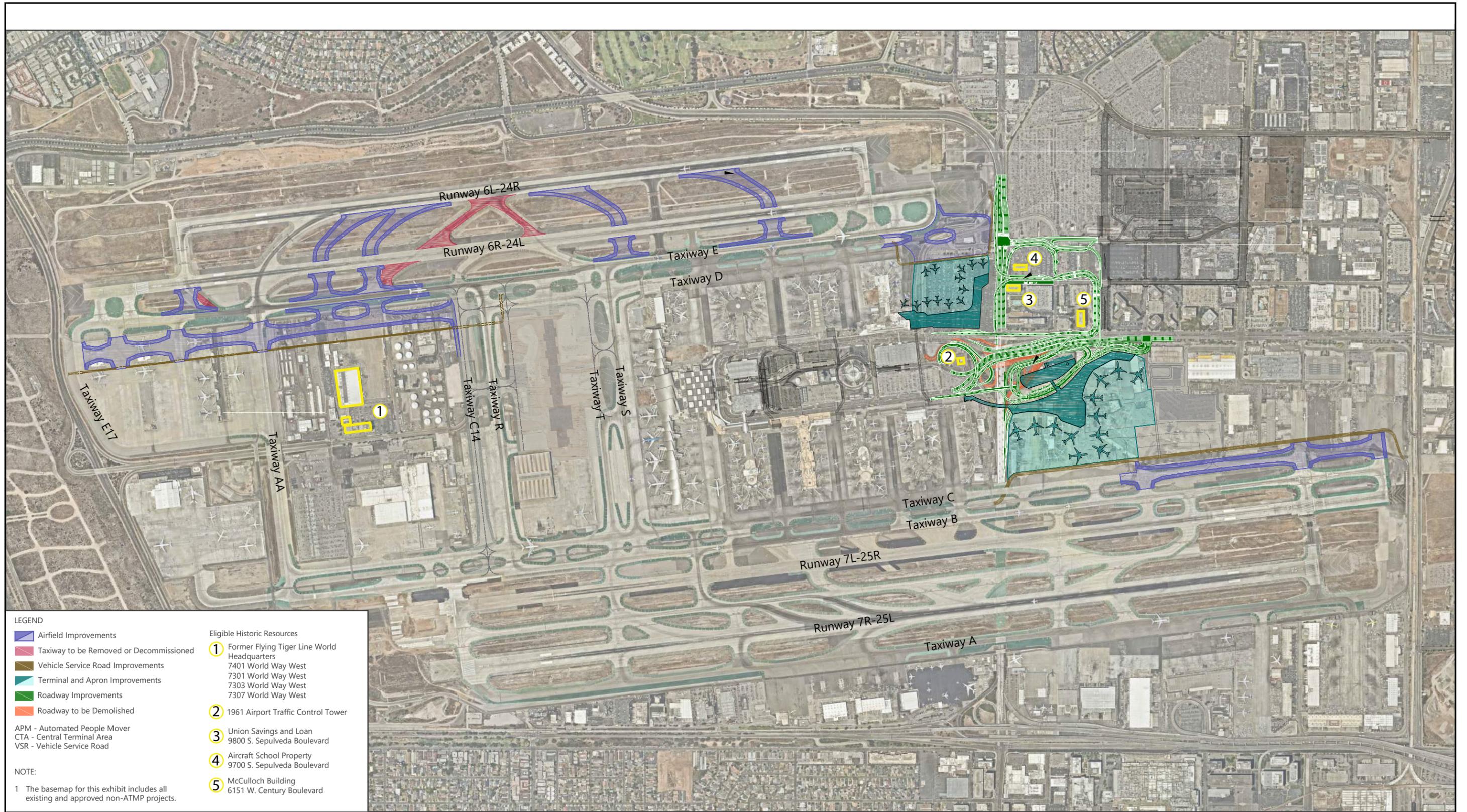
Less Than Significant Impact. As discussed in Section XVIII (Tribal Cultural Resources) below, a Sacred Lands File (SLF) records search from the California Native American Heritage Commission (NAHC) found records pertaining to the presence of Native American sacred cultural resources in the confidential NAHC archives within the project area or surrounding vicinity. Based on discussions with a representative of the Gabrielino Tongva Indians of California Tribal Council, there is no information to suggest that there are known tribal human remains that would be affected by the proposed project.⁴⁰ As stated above, the project site is located within a highly urbanized area and has been subject to disturbance by airport operations and development. Thus, surficial human remains resources that may

³⁷ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Section 4.9.1 – Historic/Architectural and Archaeological/Cultural Resources, April 2004.

³⁸ The study area for the archaeological and paleontological resources assessment for the LAX Landside Access Modernization Program included areas within and to the east of the CTA, as well as within the northern and western portions of the airport property, some of which are adjacent to the project site; refer to Figure 2 in City of Los Angeles, *Los Angeles World Airports, Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014)*, Appendix I, Archaeological and Paleontological Resources Assessment Report, prepared by PCR Services Corporation, September 2016. Available: <https://cloud1lawa.app.box.com/s/ywq6chlu0hed7vmvvc1ml28w6lr1f8p7>.

³⁹ City of Los Angeles, *Los Angeles World Airports, Final LAX Master Plan Mitigation Monitoring & Reporting Program: Archaeological Treatment Plan*, prepared by Brian F. Smith and Associates. June 2005. Available: https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/archaeological_treatment_plan.ashx?la=en&hash=9833B1960E1AE662518B5517DB42CA42F55FAE0E.

⁴⁰ Telephone conversation with Robert Dorame, Chairman, Gabrielino Tongva Indians of California Tribal Council, March 7, 2019.



Source: Ricondo & Associates, Inc., 2018.
Prepared by: CDM Smith, December 2018.



LAX Airfield and Terminal Modernization Project

Proximity of Eligible Historical Resources to Proposed Project Elements

Figure
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have existed at one time have likely been displaced by these disturbances. While discovery of human remains in artificial fill deposits within the project area is unlikely, proposed excavations could impact previously unknown buried human remains. However, LAWA would comply with existing guidance as to the treatment of any human remains that are encountered during construction excavations, including the procedures outlined in Sections 7050.5(b) and (c) of the State Health and Safety Code, and Sections 5097.94(k) and (i) and Sections 5097.98(a) and (b) of the Public Resources Code. Through compliance with state and local regulations, disturbance of any human remains, including those interred outside of formal or dedicated cemeteries, would be less than significant and no further evaluation in the EIR is required.

VI. ENERGY.

Would the project:

- a. **Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?**
- b. **Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?**

Potentially Significant Impact. Construction and operation of the proposed project would require energy resources, such as electricity, natural gas, and various transportation-related fuels. Construction of the proposed project would include energy demand from worker, vendor, and haul vehicle trips, as well as construction equipment usage. During project operations, electricity and natural gas consumption would result from a number of activities, including space heating and cooling, airfield and terminal lighting, and food preparation. Electricity would also be used indirectly in the delivery, treatment, and distribution of water used by the proposed project improvements and the treatment of wastewater. Other energy consumption during project operations would include aviation fuel for aircraft, as well as diesel, gasoline, and alternative fuels for GSE and airport-related motor vehicle trips.

LAWA has adopted numerous sustainability plans and guidelines to reduce energy requirements throughout the airport, including LAWA's Sustainable Design and Construction Policy.⁴¹ As described in Section 3.3 above, the proposed project would be designed and constructed in accordance with the Sustainable Design and Construction Policy, which requires that the new building be designed to achieve the United States Green Building Council's (USGBC) Leadership in Energy and Environmental Design (LEED®) Silver certification.⁴² LEED® Silver certification requires a project to be designed in a manner to save energy, water, and other resources, and to generate less waste and support human health. The proposed project would also be required to be constructed in accordance with current state energy efficiency standards and with the LAGBC, which is based on the California Green Building Code (CALGreen).^{43,44} Moreover, as discussed in Section 3, Project Description, above, the proposed project consists of several airfield improvements that would enhance efficiency within the north airfield, which may reduce fuel consumption associated with aircraft operations.

⁴¹ City of Los Angeles, Los Angeles World Airports, *LAWA Sustainable Design and Construction Policy*, September 7, 2017.

⁴² City of Los Angeles, Los Angeles World Airports, *LAWA Sustainable Design and Construction Policy*, September 7, 2017.

⁴³ City of Los Angeles, Los Angeles Municipal Code, Chapter IX, Article 9, *Green Building Code*, as amended.

⁴⁴ 24 California Code of Regulations, Part 11, California Building Standards Commission, *2016 California Green Building Standards Code (CALGreen)*. Available: https://codes.iccsafe.org/content/document/657?site_type=public.

In accordance with State CEQA Guidelines Section 15126.2(b), the EIR will evaluate the proposed project's energy use for all project phases and components, including transportation-related energy during construction and operation.

VII. GEOLOGY AND SOILS.

Would the project:

- a. **Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:**
 - i. **Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.**
 - ii. **Strong seismic ground shaking?**

Less Than Significant Impact. Fault rupture is the surface displacement that occurs along the surface of a fault during an earthquake. The project site is located within the seismically active southern California region; however, there is no evidence of faulting on the project site, and it is not located within a State of California Earthquake Fault Zone (formerly known as an Alquist-Priolo Special Study Zone).⁴⁵ Geotechnical literature indicates that the Charnock Fault, a potentially active fault, may be located near or through the eastern portions of LAX property (the easternmost element of the proposed project [i.e., Taxilane C extension] is located in the vicinity of the inferred fault line [the inferred fault line represents a southerly extension of Charnock Fault Trend, which is mapped approximately three miles north of the airport]). However, evaluation indicates that the Charnock Fault is considered to have low potential for surface rupture independently or in conjunction with movement on the Newport-Inglewood Fault Zone, which is located approximately three miles east of LAX.⁴⁶

The design and construction of all proposed project improvements would comply with current Los Angeles Building Code (LABC) and Uniform Building Code (UBC) requirements to reduce potential risks associated with fault rupture or strong seismic ground shaking. As such, the potential for substantial direct or indirect adverse effects resulting from rupture of a known earthquake fault or strong seismic ground shaking would be less than significant during construction and operation of the proposed project and no further evaluation in the EIR is required.

- iii. **Seismic-related ground failure, including liquefaction?**

Less Than Significant Impact. Liquefaction is a seismic hazard that occurs when strong ground shaking causes saturated granular soil (such as sand) to liquefy and lose strength. The susceptibility of soil to liquefy tends to decrease as the density of the soil increases and the intensity of ground shaking decreases. Liquefaction potential is greatest where the groundwater levels are shallow and where submerged loose, fine sands occur within a depth of about 50 feet or less. The groundwater table below the eastern portion of LAX (where the majority of the project site is located) is at a depth of

⁴⁵ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Technical Report 12, Earth/Geology, April 2004.

⁴⁶ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Technical Report 12, Earth/Geology, April 2004.

approximately 90 feet below ground surface.⁴⁷ This groundwater depth indicates that the site has a very low susceptibility to liquefaction.⁴⁸ Historically, perched groundwater has been noted at several locations at LAX and these areas could be subject to liquefaction; however, the overall potential for liquefaction at LAX is considered low.⁴⁹

Strong ground shaking will also tend to compact loose to medium dense deposits of partially saturated granular soils and could result in seismic settlement of foundations and the ground surface at LAX. Due to variations in material type, seismic settlements could vary considerably across LAX, but are generally estimated to be between negligible and 0.5 inch; the overall potential for damaging seismically-induced settlement is considered to be low.⁵⁰

Seismically-induced ground shaking can also cause slope-related hazards through various processes including slope failure, lateral spreading, flow liquefaction, and ground lurching.^{51,52} Because the project site is flat, there is no potential for slope failures at the project site.

The California Department of Conservation (CDC) is mandated by the Seismic Hazards Mapping Act of 1990 to identify and map the state's most prominent earthquake hazards in order to help avoid damage resulting from earthquakes.⁵³ The CDC's Seismic Hazard Zone Mapping Program charts areas prone to liquefaction and earthquake-induced landslides throughout California's principal urban and major growth areas. According to the Seismic Hazard Map for the Venice and Inglewood Quadrangles, no potential liquefaction zones are located within the LAX area. Isolated zones of potential seismic slope instability are identified within the Dunes to the west of the proposed project site.^{54,55} Given the flat topography of the project site, it would not be subject to slope instability and the potential instability within the Dune area to the west would not pose a risk to the project site.

In summary, the potential for seismic-related ground failure at the proposed project site due to liquefaction is considered low. All construction would be designed in accordance with the provisions

⁴⁷ United Airlines, *Human Health Risk Assessment United Airlines Maintenance Operations Center Los Angeles International Airport*, prepared by Environmental Resources Management (ERM), January 2011.

⁴⁸ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Technical Report 12, Earth/Geology, April 2004.

⁴⁹ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Technical Report 12, Earth/Geology, April 2004.

⁵⁰ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Technical Report 12, Earth/Geology, April 2004.

⁵¹ Lateral Spreading: Deformation of very gently sloping ground (or virtually flat ground adjacent to an open body of water) that occurs when cyclic shear stresses caused by an earthquake induce liquefaction, reducing the shear strength of the soil and causing failure and "spreading" of the slope.

⁵² Ground Lurching: Ground lurching (and related lateral extension) is the horizontal movement of soil, sediments, or fill located on relatively steep embankments or scarps as a result of earthquake-induced ground shaking. Damage includes lateral movement of the slope in the direction of the slope face, ground cracks, slope bulging, and other deformations.

⁵³ California Public Resources Code Sections 2690-2699.6, *Seismic Hazards Mapping Act*.

⁵⁴ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Technical Report 12, Earth/Geology, April 2004.

⁵⁵ California Department of Conservation, California Geological Survey, *Earthquake Zones of Required Investigation Venice Quadrangle – Seismic Hazard Zones*, March 25, 1999. Available: <http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/VENICE.pdf>.

of the UBC and the LABC. Potential impacts associated with seismic-related ground failure, including liquefaction, would be less than significant during construction and operation of the proposed project and no further evaluation in the EIR is required.

iv. Landslides?

No Impact. The project site and vicinity are relatively flat and are primarily surrounded by existing airport and urban development. Furthermore, the City of Los Angeles Landslide Inventory and Hillside Areas map does not identify any areas in the vicinity of the project site that contain unstable slopes which may be prone to seismically-produced landslides.⁵⁶ Implementation of the proposed project would not result in the exposure of people or structures to the risk of landslides or exacerbate landslide risks during a seismic event. Therefore, no impacts resulting from landslides would occur during construction and operation of the proposed project and no further evaluation in the EIR is required.

b. Result in substantial soil erosion or the loss of topsoil?

No Impact. The project site has flat topography and consists almost entirely of impervious surfaces (asphalt, concrete, and structures), with the exception of small isolated landscape pockets; therefore, no soil erosion or loss of topsoil on the project site is expected to occur. The proposed project would result in the demolition of existing pavement on the project site, as well as excavation and use of fill during construction. LAWA would comply with LABC Sections 91.7000 through 91.7016, which include construction requirements for grading, excavation, and use of fill. Compliance with these requirements would reduce the potential for wind or waterborne erosion. In addition, the LABC requires an erosion control plan to be reviewed by the Department of Building and Safety prior to construction if grading exceeds 200 cubic yards and occurs during the rainy season (between November 1 and April 15), and the state MS4 Construction General Permit requires the preparation of a construction Stormwater Pollution Prevention Plan (SWPPP) and implementation of Best Management Practices (BMPs) including erosion and sedimentation control measures for ground disturbance of one acre or more. As a result, construction of the proposed project would not result in substantial soil erosion. Operation of the proposed project facilities would not result in the potential for soil erosion or the loss of topsoil. Based on the above, no impact related to substantial soil erosion or the loss of topsoil would occur with implementation of the proposed project and no further evaluation in the EIR is required.

c. Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less Than Significant Impact. Settlement of foundation soils beneath engineered structures or fills typically results from the consolidation and/or compaction of the foundation soils in response to the increased load induced by the structure or fill. The presence of undocumented and typically weak artificial fill at LAX creates the potential for settlement.⁵⁷ The Lakewood Formation also includes some silt and clay layers prone to settlement. However, foundation design features and construction methods can reduce the potential for excessive settlement at LAX, including the project site, and the overall potential for damaging settlement is considered low.⁵⁸ Therefore, implementation of the

⁵⁶ City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit C, Landslide Inventory & Hillside Areas in the City of Los Angeles, November 1996.

⁵⁷ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Technical Report 12, Earth/Geology, April 2004.

⁵⁸ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements*, (SCH 1997061047), Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact*

proposed project would not adversely affect a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslides, lateral spreading, subsidence, liquefaction, or collapse. The impact of the proposed project during both construction and operation would be less than significant, and no further evaluation in the EIR is required. See also Sections VII.a.iii and VII.a.iv above.

d. Be located on expansive soil, as defined in Table 18-1-B of the Los Angeles Building Code (2002), creating substantial direct or indirect risks to life or property?

Less Than Significant Impact. Expansive soils are typically composed of certain types of silts and clays that have the capacity to shrink or swell in response to changes in soil moisture content. Shrinking or swelling of foundation soils can lead to damage to foundations and engineered structures including tilting and cracking. Fill materials located in some portions of the LAX area could be prone to expansion, and some portions of the Lakewood Formation found beneath the eastern portion of LAX may also be susceptible, due to their higher content of clay and silt.⁵⁹ The new building area that would be constructed as part of the proposed project could be subject to the effects of expansive soils. As project construction would occur in accordance with LABC Sections 91.7000 through 91.7016, which include construction requirements for grading, excavation, and foundation work. Compliance with these requirements would minimize the potential for risks to life or property because of expansive soils. The design and construction of the proposed project would comply with current UBC requirements and would not result in any structural or engineering modifications that could increase exposure of people or structures to direct or indirect risk associated with expansive soils. The impact of the proposed project during both construction and operation would be less than significant, and no further evaluation in the EIR is required.

e. Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The project site is located in an urbanized area where wastewater infrastructure is currently in place. The proposed project would not use septic tanks or alternative wastewater disposal systems. Therefore, no impacts related to the ability of onsite soils to support septic tanks or alternative wastewater systems would occur with implementation of the proposed project and no further evaluation in the EIR is required.

f. Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less Than Significant Impact. The LAX property lies in the northwestern portion of the Los Angeles Basin, a broad structural syncline with a basement of older igneous and metamorphic rocks overlain by thick younger marine and terrestrial deposits. The older deposits that underlie the LAX area are assigned to the Palos Verdes Sand formation. The Palos Verdes Sand formation is one of the better-known Pleistocene age deposits in southern California. The unit was deposited in a shallow sea that covered the region some 124,000 years ago. These deposits have a high potential for yielding

Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047), Technical Report 12, Earth/Geology, April 2004.

⁵⁹ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Technical Report 12, Earth/Geology, April 2004.

unique paleontological deposits. The Palos Verdes Sand formation covers half of the LAX area, beginning at Sepulveda Boulevard and extending easterly beyond the airport.⁶⁰

The records search conducted for the LAMP from the Vertebrate Paleontology Department at the Natural History Museum of Los Angeles County (NHMLAC) indicated that there were no known paleontological localities within the vicinity of the proposed project.⁶¹ As mentioned previously, the project site is located within a highly urbanized area and has been subject to disturbance by airport operations and development, and other on-going construction activities that have likely displaced surficial paleontological resources. While discovery of paleontological resources in artificial fill deposits within the project area is unlikely, proposed excavations at the project site could impact intact, unique 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 site, the proposed project could impact previously unknown buried unique paleontological resources.

LAWA has developed and adopted plans, policies, and procedures that address potential impacts to paleontological resources, which are documented in LAWA's Paleontological Management Treatment Plan (PMTP).⁶² LAWA requires all construction projects at LAX to comply with the PMTP and will apply this requirement to the proposed project. With implementation of the PMTP, monitoring for the presence of previously-unknown paleontological resources would occur during construction, when warranted, and discoveries of paleontological resources would be handled in accordance with the PMTP and with all applicable laws and regulations. As a result, impacts of the proposed project on unique paleontological resources would be less than significant and no further evaluation in the EIR is required.

VIII. GREENHOUSE GAS EMISSIONS.

Would the project:

- a. **Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?**
- b. **Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?**

Potentially Significant Impact. Construction of the proposed project would generate greenhouse gas (GHG) emissions from vehicle exhaust associated with construction-related activities, including off-road construction equipment, construction worker commuting, and haul/vendor truck trips. During operations, the proposed project would generate GHG emissions from aircraft, APUs, GSE, and vehicle exhaust, as well as indirect GHG emissions from energy use associated with lighting and heating, ventilation, and air conditioning (HVAC) equipment, solid waste disposal, and electricity used to supply water to LAX and to deliver wastewater to wastewater treatment facilities. The potential for the proposed project to (1) generate GHG emissions, either directly or indirectly, that may have a

⁶⁰ City of Los Angeles, *Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047)*, Section 4.9.2 – Paleontological Resources, April 2004.

⁶¹ City of Los Angeles, Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program, (SCH 2015021014)*, Appendix I, Archaeological and Paleontological Resources Assessment Report, Prepared by PCR Services Corporation, September 2016. Available: <https://cloud1lawa.app.box.com/s/ywq6chlu0hed7vmvtc1ml28w6lr1f8p7>.

⁶² City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Paleontological Management Treatment Plan*, prepared by Brian F. Smith and Associates, December 2005. Available: https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/paleontological_management_treatment_plan.pdf.

significant impact on the environment, and/or (2) conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions will be evaluated in the EIR.

IX. HAZARDS AND HAZARDOUS MATERIALS.

Would the project:

- a. **Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?**

Less Than Significant Impact. The proposed project would not result in any substantial changes in the use of hazardous materials. Construction and operation of the proposed project would involve some use of hazardous materials, including vehicle fuels, oils, transmission fluids, cleaning solvents, and architectural coatings, similar to those typically found at construction sites, as well as those hazardous materials used for airfield and terminal maintenance activities. These types of materials are not acutely hazardous, and storage, handling, and disposal of these materials are strictly regulated. Compliance with existing federal, state, and local regulations and routine precautions would reduce the potential for accidental releases of a hazardous material to occur and would minimize the impact of an accident should one occur. Such regulations include, but are not limited to, the Emergency Planning and Community Right-to-Know Act,⁶³ which requires emergency release notification, chemical inventory reporting, and toxic release inventories for facilities that handle chemicals; the Resource Conservation Recovery Act (RCRA) Subtitle I,⁶⁴ which establishes design, construction, and operational standards to prevent hazardous substances releases from underground storage tanks (USTs); the Hazardous Materials Release Response Plans and Inventory Act (also known as the Business Plan Act),⁶⁵ which requires businesses using hazardous materials to prepare a hazardous materials business plan that describes their facilities, inventories, emergency response plans, and training programs; the California Hazardous Materials Release Response Plans and Inventory Law,⁶⁶ which requires the development of detailed hazardous materials inventories used and stored onsite, a program of employee training for hazardous materials release response, and the identification of emergency contacts and response procedures; the California Hazardous Waste Control Law,⁶⁷ which regulates the generation, transportation, treatment, storage, and disposal of hazardous waste; California law which requires a permit to operate a UST system that stores hazardous substances (owners or operators of USTs must meet specific construction, design, and monitoring requirements, along with periodic testing and recordkeeping responsibilities);⁶⁸ and the Los Angeles Fire Code, Chapter 50, Hazardous Materials – General Provisions.

As identified in Section 3, some existing facilities that are involved in the storage or use of hazardous materials would be removed with project implementation. Specifically, as identified in Section 3.1.1.1.2, implementation of the proposed project would require removal of a hazardous materials storage shed at the existing FedEx facility located on the west side of the airport and some aircraft

⁶³ 42 United States Code, Section 116 et seq., *Emergency Planning and Community Right-to-Know Act*. Available: <https://www.govinfo.gov/content/pkg/USCODE-2011-title42/html/USCODE-2011-title42-chap116.htm>.

⁶⁴ 42 United States Code, Section 6991 et seq., *Regulation of Underground Storage Tanks*.

⁶⁵ California Legislative Law, California Health and Safety Code. Section 25500 et seq.

⁶⁶ California Health and Safety Code, Division 20, Chapter 6.9.5, *Hazardous Materials Release Response Plans and Inventory Law*. Available: http://leginfo.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=20.&title=&part=&chapter=6.95.&article=1.

⁶⁷ 22 California Code of Regulations, Section 66260 et. seq., *Hazardous Waste Control Law*. Available: <http://www.dtsc.ca.gov/LawsRegsPolicies/Title22/>.

⁶⁸ California Legislative Law, *California Health and Safety Code*, Section 25280 et seq.

fueling system infrastructure located at the north end of the LAX Fuel Farm would be relocated. FedEx would continue to comply with existing federal, state, and local regulations pertaining to the use and storage of hazardous materials, including those identified above, and the LAX Fuel Farm would continue to operate the fueling system in compliance with existing regulations.

With compliance with existing regulations and routine precautions discussed above, impacts from the implementation of the proposed project associated with the routine use, transport, and disposal of hazardous materials would be less than significant and no further evaluation in the EIR is required.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Potentially Significant Impact. Upset and accident conditions involving the release of hazardous materials into the environment could occur at the project site. Inadvertent releases of hazardous materials, environmental exposure to hazardous building materials during construction, and potential impacts associated with existing soil and groundwater contamination on the project site are addressed below.

Inadvertent Releases

Inadvertent releases of hazardous or regulated materials on construction sites are typically localized and would be cleaned up in a timely manner. LAWA inspectors are present on construction sites at LAX throughout construction. In addition, other LAWA-authorized personnel routinely visit and inspect construction sites. Further, proper containment, spill control, and disposal of hazardous waste associated with potential releases of hazardous or regulated substances during demolition, construction, and operation would be addressed through compliance with existing federal, state, and local regulations described in Section IX.a above. Additionally, as discussed in Section X (Hydrology and Water Quality) below, the use of construction BMPs implemented as part of a SWPPP would minimize potential adverse effects to the general public and environment from inadvertent releases during demolition, construction, and operation of the proposed project. In accordance with the State Water Resources Control Board's (SWRCB) Construction General Permit (State Water Resources Control Board Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ), temporary construction BMPs specified in Construction SWPPPs at LAX include, but are not limited to, the following: material transfer practices; waste management practices; roadway cleaning/tracking control practices; vehicle and equipment practices; and fueling practices.⁶⁹

With these SWPPP requirements, implementation of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment. Impacts related to inadvertent releases would be less than significant and no further evaluation in the EIR is required.

Hazardous Building Materials

Construction of the proposed project would require the demolition and removal of existing buildings located at the airport. Due to the age of the buildings, there is a possibility that asbestos-containing materials (ACM) and lead-containing surfaces (LCS) may be detected prior to demolition of the

⁶⁹ California State Water Resources Control Board, *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction and Land Disturbance Activities*, Adopted Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ, NPDES No. CAS000002, July 17, 2012, complete download with Attachments and Appendices updated January 23, 2013. Available: https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/wqo_2009_0009_complete.pdf.

buildings. In addition, other materials of potential concern in onsite structures include, but are not limited to, electrical transformers (possible polychlorinated biphenyl [PCB]-containing oils); fluorescent light bulbs (possible mercury); fluorescent light ballasts (possible PCB-containing oils); high intensity light bulbs (possible mercury); thermostat switches (possible liquid mercury and/or batteries); emergency lighting and exit signs (possible lead acid or other metal containing batteries or tritium); and HVAC and refrigeration systems (possible chlorofluorocarbon gas).

Appropriate protective and materials management measures would be implemented prior to demolition of any buildings and during abatement of hazardous building materials, where required, in accordance with applicable federal, state, and local health and safety requirements. Specifically, SCAQMD Rule 1403 specifies work practice requirements to limit asbestos emissions from building demolition and renovation activities, including the removal and associated disturbance of ACM.⁷⁰ The rule's requirements for demolition and renovation activities include asbestos surveying, notification, ACM removal procedures and time schedules; ACM handling and clean-up procedures; and storage, disposal, and landfilling requirements for asbestos-containing waste materials. The federal Occupational Safety and Health Act (OSHA) and California Occupational Safety and Health Act (CalOSHA) regulations, specifically 8 CCR §1529 and 8 CCR §1532.1, would also apply to the abatement and disposal of hazardous building materials such as ACM and LCS.^{71,72} Compliance with these existing regulations would limit worker and environmental risks by requiring notification to employees who work in the vicinity of hazardous materials; controlling site access; requiring use of personal protective equipment; specifying demolition/renovation procedures, housekeeping controls, training and, in some cases, air monitoring and medical surveillance to reduce potential exposure; and requiring that materials be disposed of or recycled by licensed abatement contractors. CalOSHA also requires preparation of an Injury and Illness Prevention Program, which is an employee safety program of inspections, procedures to correct unsafe conditions, employee training, and occupational safety communication. In accordance with LAWA standard practices for development projects at LAX and with City requirements that mandate compliance with California Health and Safety Code requirements, prior to the issuance of any permit for the demolition of the existing maintenance facility hangars, LAWA would provide a letter to the Los Angeles Department of Building and Safety from a qualified asbestos abatement consultant indicating that no ACMs are present in the building.^{73,74}

Additionally, construction work would be required to comply with LAWA's Design and Construction Handbook⁷⁵ which mandates compliance with all requirements of environmental regulatory agencies, including but not limited to the federal and state Environmental Protection Agencies, the Certified Unified Program Agency, the Air Quality Management District, and the local ordinances as cited in the City's Municipal Code. These requirements include obtaining the proper permits for any construction, demolition, and/or remediation activities.

⁷⁰ South Coast Air Quality Management District, *Rule 1403 - Asbestos Emissions From Demolition/Renovation Activities*, October 5, 2007. Available: <https://www.arb.ca.gov/drdb/sc/curhtml/r1403.pdf>.

⁷¹ 29 USC, Sections 651 et seq., *Occupational Safety and Health Act*.

⁷² California Labor Code, Section 6300 et seq., *California Occupational Safety and Health Act*.

⁷³ City of Los Angeles, Los Angeles World Airports, *2017 Design and Construction Handbook: Design Standards & Guide Specifications – General Requirements*, July 2017. Available: <https://www.lawa.org/-/media/lawa-web/tenants411/file/division-01-july-2017.ashx?la=en&hash=573DEC6E2A9501A7831B7D636A1BAB2F1D639AD3>.

⁷⁴ City of Los Angeles, Department of Building and Safety, *Information Bulletin/Public - Building Code Document No. P/BC 2017-067, Asbestos Notification for Demolition/Alteration Permits*, Effective January 1, 2017.

⁷⁵ City of Los Angeles, Los Angeles World Airports, *2017 Design and Construction Handbook: Planning – Permitting Agencies and the FAA*, October 2017. Available: <https://www.lawa.org/-/media/lawa-web/tenants411/file/dch2017/planning/12-permitting-agencies-and-the-faa-october-2017.ashx?la=en&hash=D9FAEE15EBF655EFE4368F4D7FA4E725AF4868F6>.

Transport of ACMs, LCS, or other hazardous materials off-site would be performed by licensed hazardous waste haulers. Disposal would comply with applicable local, state, and federal regulations governing disposal of hazardous materials, including transport by a licensed waste hauler and disposal at a properly certified facility; these regulations are designed to prevent hazardous waste transportation and disposal from causing significant hazards to the public and the environment.

Kettleman Hills Landfill, Buttonwillow, or another Class I landfill in the United States would be utilized for disposal of hazardous waste, based on facility and hazardous material requirements. ACMs are classified as non-hazardous waste and are not federally regulated (i.e., not regulated under RCRA [non-RCRA-Hazardous waste]); however, only certain facilities accept this type of waste, such as the Azusa Land Reclamation Management Facility. Construction debris contaminated with lead must be tested to determine proper disposal options. Depending on the concentration levels, it may be disposed as construction debris or may require disposal as a RCRA hazardous waste or non-RCRA hazardous waste.

Compliance with the existing federal, state, and local regulations and routine precautions, as discussed in Section IX.a above, would reduce the potential for hazards to the public or the environment through the routine disposal or accidental release of hazardous building materials. Impacts related to hazardous building materials would be less than significant and no further evaluation in the EIR is required.

Soil and Groundwater Contamination

Construction of the proposed Concourse 0 and new airport access roadways poses the potential to interfere with ongoing groundwater remediation at the Park One (former Allied Signal) site, and construction of the proposed Terminal 9 poses the potential to interfere with ongoing remediation at the United Airlines Maintenance Operations Center located to the east. Construction of the proposed project would be coordinated with LAWA and the Los Angeles Regional Water Quality Control Board (LARWQCB), as required by existing laws and regulations. If contaminated soils are encountered during construction, testing would be conducted in accordance with existing regulations to determine appropriate abatement options. The soil would be excavated, treated, or disposed of to the satisfaction of the applicable regulatory agencies, which could include the Los Angeles Fire Department (LAFD), LARWQCB, and/or the California Department of Toxic Substances Control. As applicable, the construction contractor would be required to comply with SCAQMD Rule 1166 when excavating soil that contains VOCs. As with hazardous building materials, transport of contaminated soils (if encountered and requiring disposal) would be performed by licensed hazardous waste haulers. Disposal would comply with applicable local, state, and federal regulations governing disposal of hazardous materials, including disposal at a properly certified facility; these regulations are designed to prevent hazardous waste transportation and disposal from causing significant hazards to the public and the environment. Even with compliance with existing regulations governing the handling of contaminated materials encountered during construction, implementation of the proposed project has the potential to interfere with ongoing remediation at the sites identified above, with the potential to result in a significant hazard to the public or the environment. The EIR will evaluate whether construction or operation of the proposed project has the potential for significant hazards to the public or the environment associated with existing soil and/or groundwater contamination remediation activities.

Summary of Impacts

In summary, construction and operation of the proposed project would not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment from inadvertent releases and

hazardous building materials. The potential for implementation of the proposed project to create a significant hazard to the public or the environment associated with existing soil and/or groundwater contamination remediation activities in areas that would be developed under the proposed project will be evaluated in the EIR.

c. Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

No Impact. There are no schools located or proposed within one-quarter mile of the project site. (As noted in Section 3, the Los Angeles Community College District offers a periodic course at a warehouse facility that is located close to the proposed landside improvements; however, the facility is not a school.) Therefore, no impacts related to the emitting of hazardous emissions or the handling of hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

d. Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

Potentially Significant Impact. There are a number of USTs and above ground storage tanks (ASTs) which store hazardous materials at LAX, including within the project site. As discussed in Section IX.a above, the handling and storage of hazardous substances, including related to USTs and ASTs, are subject to numerous federal, state, and local regulations. Such USTs and ASTs are identified on lists of hazardous material sites compiled pursuant to Government Code Section 65962.5; however, inclusion on such lists does not necessarily indicate that an unauthorized release of a hazardous substance has occurred that could result in a significant hazard to the public or the environment. As discussed in Section IX.b above, portions of the project site have groundwater and soil contamination and are active cleanup sites under regulatory oversight. Both Park One (former Allied-Signal) and the United Airlines Maintenance Operations Center are included in lists of hazardous material sites compiled pursuant to Government Code Section 65962.5, and are included in the SWRCB's GeoTracker, which is the agency's data management system for sites that impact, or have the potential to impact, water quality in California, with an emphasis on groundwater. No active/open sites are listed for LAX on the California Department of Toxic Substances Control's EnviroStor data management system for tracking cleanup, permitting, enforcement, and investigation efforts at hazardous waste facilities and sites with known contamination or sites where there may be reasons to investigate further.⁷⁶ The EIR will evaluate whether construction or operation of the proposed project would create a significant hazard to the public or the environment with respect to the Park One (former Allied-Signal) and the United Airlines Maintenance Operations Center sites, including impacts associated with the excavation and removal of USTs.

e. For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

Potentially Significant Impact. As discussed in Section XIII (Noise) below, construction and operation of the proposed project may generate noise and vibration levels in excess of applicable federal, state

⁷⁶ California Department of Toxic Substances Control EnviroStor database. Available: <https://www.envirostor.dtsc.ca.gov/public/map/?myaddress=lax>.

and/or local noise standards. As such the EIR will evaluate whether construction or operation of the proposed project would result in excessive noise for people residing or working in the project area.

Regarding safety hazards, the project site is located within a public airport. Numerous safeguards are required by law to minimize the potential for, and the effects from, an accident if one were to occur. FAA's Airport Design Standards establish, among other things, land use related guidelines to protect people and property on the ground, including establishment of safety zones that keep areas near runways free of objects that could interfere with aviation activities.⁷⁷ Section 12.50 of the Comprehensive Zoning Plan of the City of Los Angeles regulates building height limits and land uses within the Hazard Area established by the Planning and Zoning Code to protect aircraft approaching and departing from LAX from obstacles.⁷⁸ In addition to the many safeguards required by law, LAWA and tenants of LAX maintain emergency response and evacuation plans that also serve to minimize the potential for and the effects of an accident.

All proposed project buildings/structures would be designed in accordance with FAA's Airport Design Standards to ensure that the buildings/structures do not interfere with Airport Traffic Control Tower (ATCT) activities or affect airfield safety. Construction activities would be coordinated with FAA through the use of Form FAA 7460-1 (Notice of Proposed Construction or Alteration), which requires that any potential hazards to air navigation be addressed.

As described in Section 3 of this Initial Study, the proposed project includes a number of airfield elements to address aviation safety within the north airfield, in particular, modifications to the Runway 6L-24R exits. These improvements would require the relocation of existing navigational aids on the north airfield, as identified in Section 3.1.1.2.2. Implementation of the proposed project, including the modifications to the north airfield and the related changes to navigational aids, would enhance the safety of the north airfield.

By improving the north airfield, and adhering to FAA Airport Design Standards in the design of new buildings/structures, the project would not result in a safety hazard for people residing or working in the project area and no further evaluation in the EIR is required.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

No Impact. LAWA and tenants of LAX maintain emergency response plans and emergency evacuation plans to minimize the potential for and the effects of an accident, should one occur. Construction activities at the proposed project site and staging areas would comply with LAWA and FAA guidelines and procedures that are in place to limit the impacts of construction at the airport, including the potential to affect emergency response. LAWA's Design and Construction Handbook specifies that a Logistic Plan and fully documented Logistical Work Plan Checklist be developed for construction projects. Required information includes, but is not limited to, identification of emergency access provisions, emergency evacuation routes, and 24-hour emergency contact information.⁷⁹ In addition, LAWA uses Intelligent Transportation Systems (ITS), including changeable message signs, to notify

⁷⁷ U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular (AC) 150/5300-13A, Airport Design*, including errata, last update: April 17, 2018. Available: http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentNumber/150_5300-13/.

⁷⁸ City of Los Angeles, Los Angeles Municipal Code, Chapter I, Article 2, Section 12.50, *Airport Approach Zoning Regulations*.

⁷⁹ City of Los Angeles, Los Angeles World Airports, *2017 Design and Construction Handbook: Shutdown, Construction, Closeout and Safety – LAWA Construction Safety Program Requirements*, July 2016. Available: <https://www.lawa.org/-/media/lawa-web/tenants411/file/lawa-construction-safety-program-requirements-rev-4.ashx?la=en&hash=300EBAD04A4672F7DE527E2FF3F32F882C221BFE>.

drivers of construction-related activities and roadway conditions in and around the CTA, which improves traffic flows at LAX. Further, LAWA would coordinate with LAFD and Los Angeles World Airports Police Division (LAWA PD) regarding emergency access and other design needs to ensure that emergency service levels are maintained during construction. The LAWA Coordination and Logistics Management (CALM) Team would ensure that occupancy and operation of adjacent and surrounding facilities would be maintained throughout demolition and construction activities. In addition, in accordance with standard LAWA practices, all emergency access routes in the vicinity of the project site and staging areas would be kept clear and unobstructed at all times in accordance with FAA, State Fire Marshal, and Los Angeles Fire Code regulations.⁸⁰ Therefore, construction of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plan. In addition, LAWA would submit Form FAA 7460-1 (Notice of Proposed Construction or Alteration) to FAA in advance of construction as required by 14 CFR §77.9, to ensure that the proposed project would not represent an obstruction to airport operations.

With regards to operations, the proposed project facilities would operate in a manner similar to existing airfield, terminal, and roadway facilities as they relate to emergency response. In addition, use of ITS during operations notifies drivers of roadway conditions in and around the CTA, which improves traffic flows at the airport. Operation of the proposed project would not impair implementation of, or physically interfere with, an adopted emergency response plan or emergency evacuation plans. Therefore, implementation of the proposed project would have no impact related to emergency response plans or emergency evacuation plans and no further evaluation in the EIR is required.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?

No Impact. The project site is located within a developed airport and surrounded by airport uses, urbanized areas, and the Los Angeles/El Segundo Dunes. There are no fire hazard areas containing flammable brush or grass on the project site. Furthermore, the project site is not within a City of Los Angeles Wildfire Hazard Area, as delineated in the Safety Element of the General Plan.⁸¹ Therefore, implementation of the proposed project would not result in the exposure of people or structures, either directly or indirectly, to hazards associated with wildland fires and no further evaluation in the EIR is required.

X. HYDROLOGY AND WATER QUALITY.

Would the project:

a. Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. The agency with jurisdiction over water quality within the project area is the LARWQCB. The Clean Water Act (CWA) prohibits the discharge of pollutants to waters of the United States from any point source unless the discharge is in compliance with a National Pollutant Discharge

⁸⁰ U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular (AC) 150/5300-13A, Airport Design*, including errata, last update: April 17, 2018. Available: http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentNumber/150_5300-13/; U.S. Department of Transportation, Federal Aviation Administration, Federal Aviation Regulations (FAR) Sections 139.315-139.319 — *Air Rescue and Firefighting (ARFF)*; 24 California Code of Regulations, Part 9 — *California Fire Code*, Chapter 9 (Fire Protection Systems) and Chapter 10 (Means of Egress); and City of Los Angeles, Los Angeles Municipal Code, Chapter V, Article 7 — *Fire Protection and Prevention (Fire Code)*.

⁸¹ City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit D, Selected Wildfire Hazard Areas In the City of Los Angeles, April 1996.

Elimination System (NPDES) permit. In accordance with the CWA, the project site is within the region covered by NPDES Permit No. CAS004001 issued by the LARWQCB. As part of the stormwater program associated with the NPDES Phase 1 Permit, LARWQCB adopted the Standard Urban Storm Water Mitigation Plan (SUSMP) to address stormwater pollution from new development and redevelopment projects. A change to the permit puts primary emphasis on Low Impact Development (LID) practices over treatment control BMPs. The Stormwater LID Ordinance approved by the City of Los Angeles outlines requirements for providing LID strategies for new development and redevelopment projects.⁸²

Implementation of the proposed project would not result in a substantial increase in impervious surfaces at the project site, as the site is currently developed and predominantly paved, with the only exception being small areas of ornamental landscaping. However, construction activities associated with the removal or modification of existing facilities could result in sedimentation and release of other construction-related water quality pollutants (e.g., from fueling/servicing of construction equipment, storage of materials including temporary stockpiles of demolition debris, etc.). Construction activities at LAX are subject to the requirements of the State Construction General Permit (State Water Resources Control Board Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ).⁸³ The Construction General Permit sets forth requirements for the protection of surface water quality during construction activities, specifically for those activities involving more than one acre of ground disturbance, through the preparation and implementation of project-specific construction SWPPPs. LAWA has a guidance manual for the preparation and implementation of construction SWPPPs at LAX so as to comply with the requirements of the Construction General Permit.⁸⁴ Temporary construction BMPs specified in LAWA's existing Construction SWPPP for LAX include, but are not limited to, the following: soil stabilization (erosion control) techniques, sediment control methods, contractor training programs, material transfer practices, waste management practices, roadway cleaning/tracking control practices, vehicle and equipment practices, and fueling practices.

In addition to construction, operation of the proposed project would generate surface water pollutants associated with activities that include building and grounds maintenance, aircraft and ground vehicle fueling, limited de-icing as well as transport and storage of other chemicals and fuel, posing the potential to exceed state water quality standards. The type of activities and potential pollutant discharges associated with operations at LAX are regulated by the State Industrial General Permit (State Water Resources Control Board NPDES Order No. CAS000001).⁸⁵ LAWA has a SWPPP that addresses industrial activities at LAX.⁸⁶

⁸² City of Los Angeles, *Ordinance No. 181,899, Low Impact Development (LID) Strategies*, October 7, 2011. Available: http://www.lastormwater.org/wp-content/files_mf/finalidordinance181899.pdf.

⁸³ California State Water Resources Control Board, *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction and Land Disturbance Activities*, Adopted Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ, NPDES No. CAS000002, July 17, 2012, complete download with Attachments and Appendices updated January 23, 2013. Available: https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/constpermits/wqo_2009_0009_complete.pdf.

⁸⁴ City of Los Angeles, Los Angeles World Airports, *Guidance Manual for Construction Storm Water Pollution Prevention*, November 2015. Available: <https://www.lawa.org/-/media/lawa-web/environment/files/final-master-lawa-guidance-manual.ashx?la=en&hash=CCD2CA149DAEEA1E8E4DD4A419A0FD7340CA87DD>.

⁸⁵ California State Water Resources Control Board, *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities*, Order No. 2014-0057-DWQ, NPDES No. CAS000001, Adopted April 1, 2014. Available: www.lawa.org/-/media/lawa-web/environment/files/industrial-general-permit-2015.ashx?la=en&hash=0B70071123ECB3D6BF62523AEFF2CBA0A59D6279.

⁸⁶ City of Los Angeles, Los Angeles World Airports, *Storm Water Pollution Prevention Plan (SWPPP) Associated with Industrial Activities for Los Angeles International Airport*, January 18, 2018.

Further, as discussed in Section IX.a above, operation of the proposed project would involve some use of hazardous materials, including vehicle fuels, oils, transmission fluids, and cleaning solvents, similar to those currently associated with existing airfield and terminal maintenance activities. These types of materials are not acutely hazardous, and storage, handling, and disposal of these materials are strictly regulated. Compliance with existing federal, state, and local regulations discussed above and in Section IX.a, as well as routine precautions, would reduce the potential for accidental releases of a hazardous material to occur and would minimize the impact of an accident should one occur.

All of the above regulatory programs and requirements would apply to the proposed project and are intended and designed to avoid violations of water quality standards and waste discharge requirements. Based on compliance with these requirements, the proposed project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality and no further evaluation in the EIR is required.

b. Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

No Impact. The project site is located within the West Coast Groundwater Basin. Groundwater beneath the project site is not used for municipal or agricultural purposes. Construction and operation of the proposed project would not rely on groundwater supplies nor would the proposed project result in a substantial increase in the amount of impervious surface on the project site. Therefore, the proposed project would not substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that sustainable groundwater management of the basin would be impeded and no further evaluation in the EIR is required.

c. Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

- i. Result in substantial erosion or siltation on- or off-site?**
- ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite?**
- iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?**
- iv. Impede or redirect flood flows?**

No Impact. The proposed project is not located in proximity to any streams or rivers. Moreover, as noted in Section X.a above, the proposed project would be constructed on a site that is predominantly paved, with the only exception being small areas of ornamental landscaping. Implementation of the proposed project would not alter existing drainage patterns of the site or area through the alteration of the course of a stream or river or through the addition of impervious surfaces in a manner that would result in erosion or substantial erosion or siltation on- or offsite, substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite, create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, or impede or redirect flood flows. Therefore, no impacts to water quality related to existing drainage patterns would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

d. In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

No Impact. No 100-year flood hazard areas are located within LAX.^{87,88} The westerly boundary of the project site is approximately 0.5 mile east of the Pacific Ocean and is not delineated as a potential inundation or tsunami impacted area in the City of Los Angeles Inundation and Tsunami Hazard Areas map.⁸⁹ Further, the project site is located on, and is surrounded by, relatively level terrain and urban development, with no enclosed standing bodies of water, and is therefore not located in a seiche zone. Therefore, no impacts related to the risk of release of pollutants due to project inundation would occur with the implementation of the proposed project, and no further evaluation in the EIR is required.

e. Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. As discussed in Section X.a above, the proposed project would comply with existing regulatory programs and requirements intended and designed to avoid violations of water quality standards and waste discharge requirements. Based on compliance with these requirements, the proposed project would not conflict with or obstruct implementation of a water quality control plan and no further evaluation in the EIR is required.

As discussed in Section X.b above, the project site is located within the West Coast Groundwater Basin. Groundwater beneath the project site is not used for municipal or agricultural purposes. Construction and operation of the proposed project would not rely on groundwater supplies nor would the proposed project result in a material increase in the amount of impervious surface on the project site. Therefore, the proposed project would not conflict with or obstruct implementation of a sustainable groundwater management plan and no further evaluation in the EIR is required.

XI. LAND USE AND PLANNING.

Would the project:

a. Physically divide an established community?

No Impact. The project site is located entirely within an existing urbanized area. The majority of the land uses within the project site are related to the operation of LAX. Off-airport land uses located adjacent to the proposed landside access improvements include hotels, commercial/office uses, and surface and structured parking and commercial vehicle facilities, the majority of which are related to the airport. Development of the proposed project improvements would not disrupt or divide the physical arrangement of an established community. The off-airport land uses would continue to have access to the surrounding roadway network and would continue to be accessible to their patrons. Therefore, no impacts resulting from physically dividing an established community would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

⁸⁷ City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit F, 100-Year & 500-Year Flood Plains in the City of Los Angeles, March 1994.

⁸⁸ U.S. Department of Homeland Security, Federal Emergency Management Agency, *Letter of Map Revision Based on Fill 218-65-R, Map Panel Affected: 0601370089 D*, September 6, 2002.

⁸⁹ City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, March 1994.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Potentially Significant Impact. The existing zoning for the on-airport portions of the project site is LAX Zone. Land use designations and development regulations applicable to LAX are set forth in the LAX Plan and LAX Specific Plan, both approved by the Los Angeles City Council in December 2004 and subsequently amended.^{90,91} The majority of the project site is in an area designated in the LAX Plan as "Airport Airside", with a portion of the roadway improvement in an area designated in the LAX Plan as "Airport Landside." Within the LAX Specific Plan, the site is in an area designated as within the Airport Airside Subarea and Airport Landside Subarea and zoned LAX Zone: Airport Airside Subarea and LAX Zone: Airport Landside Subarea. The acquisition parcels located east of Vicksburg Avenue are within the boundaries of the LAX Plan. These parcels are designated in the LAX Plan as "Airport Landside." Within the LAX Specific Plan, these parcels are within the Airport Landside Subarea and are zoned LAX Zone: Airport Landside Subarea. The acquisition parcels located west of Vicksburg Avenue (i.e., Los Angeles Community College District property and commercial parking lot) are not within the boundaries of the LAX Plan. These parcels are zoned Commercial (C2-2).

The proposed project includes improvements and new facilities at LAX. Land use plans applicable to the project site and operations at LAX include, but are not limited to, the LAX Plan, LAX Specific Plan, the Southern California Association of Governments 2016-2040 Regional Transportation Plan/Sustainable Communities Strategy, the Los Angeles County Airport Land Use Plan, and the City of Los Angeles' Mobility Plan 2035. In addition, the proposed landside access improvements are located within an area governed by the Westchester-Playa del Rey Community Plan and the Coastal Transportation Corridor Specific Plan. The existing LAX Plan and LAX Specific Plan would need to be amended to reflect adjustments to the LAX Specific Plan boundaries and to the Airport Landside Subarea and Airport Airside Subarea boundaries, including changing the designation of the area of the proposed roadways and parking garage to support Terminal 9 from Airport Airside to Airport Landside. In addition, the proposed project would require changes to the zoning and land use designations to properties within the Westchester-Playa del Rey Community Plan that would be acquired. The potential for the proposed project to cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect will be evaluated in the EIR.

XII. MINERAL RESOURCES.

Would the project:

a. Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. The project site is within the boundaries of the airport and surrounded by airport-related uses. There are no mineral resources on the project site, nor is the site available for mineral resource extraction given the existing airport use.⁹² Therefore, no impacts related to the loss of availability of a

⁹⁰ City of Los Angeles, Department of City Planning, *LAX Plan*, adopted December 14, 2004, last amended June 7, 2017. Available: <https://www.lawa.org/en/lawa-our-lax/plan-and-ordinances>.

⁹¹ City of Los Angeles, Department of City Planning, *Los Angeles International Airport (LAX) Specific Plan*, adopted December 14, 2004, last amended September 8, 2017. Available: <https://www.lawa.org/en/lawa-our-lax/plan-and-ordinances>.

⁹² City of Los Angeles, Department of City Planning, *Conservation Element of the City of Los Angeles General Plan*, Exhibit A, Mineral Resources, January 2001.

known, valued mineral resources would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

b. Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. The project site is not within an area delineated on the City of Los Angeles Mineral Resources map in the City of Los Angeles General Plan Conservation Element or the City of Los Angeles Oil Field & Oil Drilling Areas map in the City of Los Angeles General Plan Safety Element.^{93,94} Furthermore, the project site is disturbed and in an area that is not available for mineral resource extraction due to the existing airport use. Therefore, no impacts related to the availability of a locally-important mineral resource recovery site would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

XIII. NOISE.

Would the project result in:

- a. Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?**
- b. Generation of excessive groundborne vibration or groundborne noise levels?**
- c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?**

Potentially Significant Impact. The project site is within a public airport and not located within the vicinity of a private airstrip. Construction and operation of the proposed project may generate noise and vibration levels in excess of applicable federal, state and/or local noise standards. The EIR will evaluate whether construction or operation of the proposed project would result in: (1) generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; (2) generation of excessive groundborne vibration or groundborne noise levels; and/or (3) exposure of people residing or working in the project area to excessive noise levels.

XIV. POPULATION AND HOUSING.

Would the project:

- a. Induce substantial unplanned population growth in an area either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?**

⁹³ City of Los Angeles, Department of City Planning, *Conservation Element of the City of Los Angeles General Plan*, Exhibit A, Mineral Resources, January 2001.

⁹⁴ City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit E, Oil Field & Oil Drilling Areas in the City of Los Angeles, May 1994.

Less Than Significant Impact. The proposed project does not include residential development. The proposed project would provide new long-term employment opportunities at LAX through new concessions and passenger-serving jobs within Concourse 0 and Terminal 9. Construction of the proposed project would also result in the creation of construction jobs. These jobs are expected to be filled from the large southern California regional population and would not directly or indirectly induce population growth in the area. The proposed project would improve north airfield runway exits and taxiways and extend existing infrastructure through the construction of Concourse 0 and Terminal 9 and associated airport access roadways. The infrastructure would be extended into currently developed areas and would not directly or indirectly induce any population growth in the area surrounding the airport. Therefore, the implementation of the proposed project would not directly or indirectly induce substantial unplanned population growth directly or indirectly and no further evaluation in the EIR is required.

b. Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. There are no existing residential properties on the project site. Implementation of the proposed project would not displace existing housing or people. Therefore, no impacts on housing would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

XV. PUBLIC SERVICES.

Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services?

a. Fire protection?

Less Than Significant Impact. The LAFD provides fire protection services to the project site. Four LAFD fire stations are located on airport property (Fire Station Nos. 51, 95, 5, and 80). Fire Station No. 95, located at 10010 International Road, is approximately 0.5 mile east of the Terminal 9 site; Fire Station No. 51, located at 10435 South Sepulveda Boulevard, is approximately 0.2 mile southwest of the Terminal 9 site (opposite Sepulveda Boulevard); Fire Station No. 5, located at 8900 Emerson Avenue, is approximately 0.4 mile north of the Runway 6L-24R exits site; and Fire Station No. 80/Aircraft Rescue and Fire Fighting Facility, located at 7250 World Way West, is approximately 0.4 mile south of the Taxiway D extension west site.

The proposed project includes safety-related improvements to the north airfield, new terminal facilities (Concourse 0 and Terminal 9) and associated airfield improvements, and new airport access roadways. The project site is currently developed and used for airport uses and airport-related uses (e.g., surface vehicle parking). The proposed project would comply with all applicable City, state, and federal codes and ordinances, including LAFD and Los Angeles Building and Safety requirements.⁹⁵ The

⁹⁵ Including, but not limited to: U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular (AC) 150/5300-13A, Airport Design*, including errata, last update: April 17, 2018. Available: http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentNumber/150_5300-13/; U.S. Department of Transportation, Federal Aviation Administration, Federal Aviation Regulations (FAR) Sections 139.315-139.319, *Air Rescue and Firefighting (ARFF)*; 24 California Code of Regulations, Part 9 – *California Fire Code*, Chapter 9 (Fire Protection Systems) and Chapter 10 (Means of Egress); and City of Los Angeles, Los Angeles Municipal Code, Chapter V, Article 7 – *Fire Protection and Prevention (Fire Code)*.

existing fire protection facilities discussed above are sufficient to provide fire protection services to the proposed new facilities and, as such, the proposed project would not require new or altered fire protection facilities, the construction of which could lead to a substantial adverse physical impact. Therefore, physical impacts associated with fire protection facilities with the implementation of the proposed project would be less than significant and no further evaluation in the EIR is required.

b. Police protection?

Less Than Significant Impact. Both the LAWA PD and the City of Los Angeles Police Department LAX Detail (LAPD LAX Detail) provide police protection services to the project site. The LAWA PD station is currently located north of Park One (the proposed Concourse 0 site) but will be relocated in mid-2021 to the new LAX Airport Police Facility that is currently being developed at a 12-acre site located at the northeast corner of Westchester Boulevard and Loyola Boulevard. The development of the new LAX Airport Police Facility, and related relocation of existing police operations to the new facility, are separate from, and independent of, the Airfield and Terminal Modernization Project. Also serving LAX is the LAPD LAX Detail station located within the CTA adjacent to Terminal 8. These existing and planned police protection facilities are sufficient to provide police protection services to the proposed new facilities. The proposed project would provide safety-related improvements to the north airfield, new terminal facilities (Concourse 0 and Terminal 9) and associated airfield improvements, and new airport access roadways. The new Concourse 0 and Terminal 9 would improve passenger processing capabilities at LAX and include additional space to help meet evolving federal security requirements. Therefore, the proposed project would not result in impacts to police protection that would require the construction of new facilities or the expansion of existing facilities, especially given that development of a new larger police facility is currently underway, which is intended to serve existing and anticipated police protection needs at LAX. Physical impacts associated with police facilities associated with implementation of the proposed project would be less than significant and no further evaluation in the EIR is required.

c. Schools?

Less Than Significant Impact. The proposed project would require the acquisition of a Los Angeles Community College District property. As discussed in Section 3, per the West Los Angeles College Fall 2018, Winter 2019, and Spring 2019 course schedules, only one course per quarter currently takes place at the facility. Film Production 110-Set Dressing Crafts is offered two days per week for eight weeks during Fall 2018 and Spring 2019, and VOC ED 097CE-Blueprint for Customer Service, a one-week vocational education course, is offered in Winter 2019. Acquisition of this facility would require the Los Angeles Community College District to relocate the warehousing use and related instructional function. The current facility is not located on an existing school campus; rather, it is located in a commercial area characterized by aviation uses, hotels, surface and structured parking, and other similar uses. It is reasonable to assume that the facility could be relocated to another commercial or light industrial parcel without adversely affecting the performance objectives of the facility. Such commercial and light industrial properties are readily available in the greater project area.⁹⁶ Therefore, acquisition of the facility would not result in the need for a new facility, the construction of which could cause significant environmental impacts.

The proposed project would provide safety-related improvements to the north airfield, new terminal facilities (Concourse 0 and Terminal 9) and associated airfield improvements, and new airport access

⁹⁶ LoopNet website. Available: <https://www.loopnet.com/for-lease/multiple-property-types/?sk=6f664f4b265bee26fa5c11b161fadbf2&bb=uvn2i73snNvw3k44H> and <https://www.loopnet.com/for--sale/multiple-property-types/?sk=b1962dc57c46f1b818da7245ea3e3ad7&bb=uvn2i73snNvw3k44H>, accessed February 6, 2019.

roadways. The proposed project would not include residential development, and thus would not contribute to a direct increase in demand for schools. Further, as discussed in Section XIV.a above, although the proposed project would provide new long-term employment opportunities at LAX through new concessions and passenger-serving jobs within Concourse 0 and Terminal 9, as well as jobs during construction, these jobs are expected to be filled from the large southern California regional population and would not directly or indirectly induce population growth in the area that would result in enrollment increases that would adversely impact schools.

Based on the above, impacts on school facilities would be less than significant and no further evaluation in the EIR is required.

d. Parks?

No Impact. There are no parks in proximity to the proposed project site. The proposed project would provide safety-related improvements to the north airfield, new terminal facilities (Concourse 0 and Terminal 9) and associated airfield improvements, and new airport access roadways. The proposed project would not include residential development, and thus would not contribute to a direct increase in demand for parks. Further, as discussed in Section XIV.a above, although the proposed project would provide new long-term employment opportunities at LAX through new concessions and passenger-serving jobs within Concourse 0 and Terminal 9, as well as jobs during construction, these jobs are expected to be filled from the large southern California regional population and would not directly or indirectly induce population growth in the area that would result in increased demand for neighborhood or regional parks. Therefore, no impacts to existing parks or need for new parks would result from implementation of the proposed project and no further evaluation in the EIR is required.

e. Other public facilities?

No Impact. The proposed project would provide safety-related improvements to the north airfield, new terminal facilities (Concourse 0 and Terminal 9) and associated airfield improvements, and new airport access roadways. The proposed project does not include residential development, and thus would not contribute to a direct increase in demand for other public facilities (e.g., libraries). Further, as discussed in Section XIV.a above, although the proposed project would provide new long-term employment opportunities at LAX through new concessions and passenger-serving jobs within Concourse 0 and Terminal 9, as well as jobs during construction, these jobs are expected to be filled from the large southern California regional population and would not directly or indirectly induce population growth in the area that would result in a demand for other public facilities. Therefore, no impacts to, or need for, new public facilities would occur from implementation of the proposed project and no further evaluation in the EIR is required.

XVI. RECREATION.

- a. Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?**
- b. Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?**

No Impact. The proposed project does not include development of recreational facilities nor does it include residential development. As discussed in Section XIV.a above, although the proposed project would provide new long-term employment opportunities at LAX through new concessions and

passenger-serving jobs within Concourse 0 and Terminal 9 and jobs during construction, these jobs are expected to be filled from the large southern California regional population and would not directly or indirectly induce population growth in the area such that increased demand for neighborhood and regional parks or other recreational facilities would occur. Therefore, the proposed project would not result in substantial physical deterioration of existing area recreational facilities or require the construction or expansion of recreational facilities. As such, no impacts related to recreational facilities would occur with the implementation of the proposed project and no further evaluation in the EIR is required.

XVII. TRANSPORTATION.

Would the project:

- a. **Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?**
- b. **Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?**

Potentially Significant Impact. The proposed project includes new passenger processing facilities (Concourse 0 and Terminal 9), as well as associated modifications to the existing on- and off-airport roadway system that serves traffic approaching and departing the airport. These improvements could result in traffic pattern changes and increased volumes on the on-airport and surrounding roadways, thus potentially resulting in traffic impacts, in the form of changes in total vehicle miles traveled associated with vehicular travel to and from LAX. Additionally, construction of the proposed project would generate vehicle traffic associated with workers traveling to and from construction employee parking areas, associated shuttle trips between construction employee parking areas and construction sites, haul/delivery trips, and miscellaneous construction-related travel. These trips could result in changes in total vehicle miles traveled during the construction period. Impacts on the local roadway system also pose the potential to affect public transit and non-motorized (i.e., bicycle and pedestrian) facilities.

The EIR will evaluate whether construction or operation of the proposed project would: (1) conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities; and/or (2) conflict with or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), specifically as related to vehicle miles traveled.

- c. **Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?**

No Impact. As discussed in Section XVII.a-b above, the proposed project would modify the existing on and off-airport roadway system that serves traffic approaching and departing the airport. Construction and operation of all roadway improvements would be consistent with local and regional policies and standards, including design standards and guidelines from the Los Angeles Department of Transportation, Los Angeles County Department of Transportation, and Caltrans. Moreover, a goal of the design process is to avoid dangerous intersections or other hazardous design features. Furthermore, the project proposes on-airport safety improvements, which include relocating runway exits outside of the high-energy zone, and new acute-angled exits that would include crossings that are perpendicular to Runway 6R-24L, as opposed to the existing exits that cross Runway 6R-24L at an acute angle. Perpendicular crossings have safety benefits by providing pilots in arriving aircraft a better line of vision, allowing them to look down Runway 6R-24L for possible departing aircraft.

As such, construction or operation of the proposed project would not substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses and no further evaluation in the EIR is required.

d. Result in inadequate emergency access?

Less Than Significant Impact. The proposed project would require modifications to the existing on- and off-airport circulation system. Temporary lane closures at and near the CTA entrance may be required to facilitate some construction activities. As discussed in Section IX.f above, LAWA’s Design and Construction Handbook specifies that a Logistic Plan and fully documented Logistical Work Plan Checklist be developed for construction projects. Required information includes, but is not limited to, identification of emergency access provisions, emergency evacuation routes, and 24-hour emergency contact information.⁹⁷ Further, LAWA would coordinate with LAFD and LAWA PD regarding emergency access and other design needs to ensure that emergency service levels are maintained during construction. In accordance with standard LAWA practice, emergency access routes in the vicinity of the project site would be kept clear and unobstructed at all times during both construction and operation of the proposed project in accordance with FAA, State Fire Marshal, and Los Angeles Fire Code regulations.⁹⁸ In addition, LAWA uses ITS, including changeable message signs, to notify drivers of construction-related activities and roadway conditions in and around the CTA, which improves traffic flows at LAX. Any work within the existing right-of-way would comply with Caltrans permitting requirements. This includes a traffic control plan that adheres to the standards set forth in the California Manual of Uniform Traffic Control Devices (MUTCD).⁹⁹ As part of these requirements, there are provisions for coordination with local emergency services, training for flagmen 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. Therefore, the proposed project would not result in inadequate emergency access and impacts to emergency access would be less than significant; no further evaluation in the EIR is required.

XVIII. TRIBAL CULTURAL RESOURCES.

Would the project:

- a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code §21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is:**

⁹⁷ City of Los Angeles, Los Angeles World Airports, *2017 Design and Construction Handbook: Shutdown, Construction, Closeout and Safety – LAWA Construction Safety Program Requirements*, July 2016. Available: <https://www.lawa.org/-/media/lawa-web/tenants411/file/lawa-construction-safety-program-requirements-rev-4.ashx?la=en&hash=300EBAD04A4672F7DE527E2FF3F32F882C221BFE>.

⁹⁸ U.S. Department of Transportation, Federal Aviation Administration, *Advisory Circular (AC) 150/5300-13A, Airport Design*, including errata, last update: April 17, 2018. Available: http://www.faa.gov/airports/resources/advisory_circulars/index.cfm/go/document.current/documentNumber/150_5300-13/; U.S. Department of Transportation, Federal Aviation Administration, Federal Aviation Regulations (FAR) Sections 139.315-139.319 — *Air Rescue and Firefighting (ARFF)*; 24 California Code of Regulations, Part 9 – *California Fire Code*, Chapter 9 (Fire Protection Systems) and Chapter 10 (Means of Egress); and City of Los Angeles, Los Angeles Municipal Code, Chapter V, Article 7 – *Fire Protection and Prevention (Fire Code)*.

⁹⁹ State of California, Department of Transportation, *California Manual on Uniform Traffic Control Devices, 2014 Edition Revision 3*, March 9, 2018. Available: <http://www.dot.ca.gov/trafficops/camutcd/camutcd2014rev3.html>.

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- i. **Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code §5020.1(k), or**
 - ii. **A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code §5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code §5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe?**

Less Than Significant Impact. There are no known tribal cultural resources, as defined in Public Resources Code Section 21074, on the project site or in the immediate vicinity. The project site is highly disturbed. An SLF records search for the project site was commissioned through the NAHC to determine whether any Native American cultural resources in the confidential NAHC database were located within the project site or within a half-mile radius. An SLF records search is one tool a lead agency can use to determine whether tribal cultural resources may exist within the vicinity of a project. On January 29, 2019, the NAHC indicated that the SLF records search was completed with positive results.¹⁰⁰ LAWA contacted a representative of the Gabrielino Tongva Indians of California Tribal Council to discuss the SLF records search. The representative did not identify specific sacred resources or other tribal cultural resources that would be affected by the proposed project.¹⁰¹

Assembly Bill 52 (AB 52), approved on September 25, 2014, established a new category of resources in CEQA called “tribal cultural resources” that considers tribal cultural values in addition to scientific and archaeological values when determining impacts and mitigation. Further, AB 52 establishes a consultation process between California Native American tribal governments and lead agencies applicable to any project for which a Notice of Preparation, Notice of Intent to Adopt a Mitigated Negative Declaration, or Notice of Intent to Adopt a Negative Declaration is filed on or after July 1, 2015.

Tribal cultural resources, as defined in Public Resources Code Section 21074, are a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American Tribe, and that is either:

- Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k), or
- A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in Public Resources Code Section 5024.1(c). In applying the criteria set forth in Public Resource Code Section 5024.1(c) for the purposes of this paragraph, the lead agency shall consider the significance of the resource to a California Native American tribe.

The specific steps and timelines governing the notice and consultation process under AB 52 are as follows:

- If a tribe wishes to be notified of projects within its traditionally and culturally affiliated area, the tribe must submit a written request to the relevant lead agency.

¹⁰⁰ Quinn, Steven, Associate Governmental Program Analyst, State of California Native American Heritage Commission, Letter to Robin Ijams, CDM Smith, RE: LAX North Airfield Safety Improvement Program Project, Los Angeles County, January 29, 2019.

¹⁰¹ Telephone conversation with Robert Dorame, Chairman, Gabrielino Tongva Indians of California Tribal Council, March 7, 2019.

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- Within 14 days of determining that a private project application is complete, or to undertake a public agency project, the lead agency must provide formal notification, in writing, to the tribes that have requested notification of proposed projects.
 - If it wishes to engage in consultation on the project, the tribe must respond to the lead agency within 30 days of receipt of the formal notification.
 - The lead agency must begin the consultation process with the tribes that have requested consultation within 30 days of receiving the request for consultation.
 - Consultation concludes when either: 1) the parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource, or 2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached.¹⁰²

When LAWA initiated preparation of the Notice of Preparation for the proposed project, LAWA had received one written request from a tribe indicating its wish to be notified of projects within its traditionally and culturally affiliated areas, as required by Public Resources Code Section 21080.3.1(b). On December 6, 2018, LAWA sent a project notification letter and map to the tribe. The letter included information such as project location, a brief description of the proposed project, and results of a previous cultural resources assessment in the project area. No response was received from the tribe requesting consultation.

Operations of the proposed project would not result in any impacts to known tribal cultural resources. Given that there are no known tribal cultural resources at the project site or in the vicinity, and the fact that the project site is a highly disturbed area that has long been, and is currently being, used for airport uses, the discovery of tribal cultural resources within the project site during construction is unlikely. While discovery of tribal cultural resources in artificial fill deposits within the project area is unlikely, proposed excavations that would occur below the fill levels could have an impact on previously unknown tribal cultural resources. As discussed in Section V.b above, LAWA has developed and adopted plans, policies, and procedures that address potential impacts to archaeological resources, which are documented in LAWA's ATP. These plans, policies, and procedures include notification of the NAHC and retention of a Native American monitor if/as recommended by NAHC if a potentially significant or unique Native American archaeological resource or human remains are encountered during construction. LAWA requires all construction projects at LAX to comply with the ATP, and will apply this requirement to the proposed project. These measures would also address potential impacts on tribal cultural resources. By adhering to the ATP, impacts to tribal cultural resources would be less than significant and no further evaluation in the EIR is required.

XIX. UTILITIES AND SERVICE SYSTEMS.

Would the project:

- a. Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?**

¹⁰² State of California, Governor's Office of Planning and Research, *Technical Advisory: AB 52 and Tribal Cultural Resources in CEQA*, June 2017. Available: <http://nahc.ca.gov/wp-content/uploads/2017/06/Technical-Advisory-AB-52-and-Tribal-Cultural-Resources-in-CEQA.pdf>.

Potentially Significant Impact. The proposed Concourse 0 and Terminal 9 facilities could result in an increased demand for water and would generate wastewater requiring conveyance. Construction of new water and wastewater lines to serve the proposed facilities would be required. The impact of constructing new wastewater lines and the impact of additional wastewater conveyance will be evaluated in the EIR.

Regarding stormwater drainage facilities, as described in Section X.a, implementation of the proposed project would not materially increase the amount of impermeable surface areas on the project site or affect drainage patterns or stormwater drainage systems. While implementation of the proposed project includes development of new facilities that would require the alteration of existing storm drain facilities, such as relocating/rerouting existing storm drain lines where new development is proposed, and may require the construction of new storm drain facilities, it is anticipated that such storm drain facility improvements would occur in conjunction with the development of the project components and would not result in significant environmental effects on their own. Construction of the storm drain system improvements is not anticipated to cause significant environmental effects and no further evaluation in the EIR is required.

Regarding electric power, natural gas, and telecommunications facilities, similar to stormwater facilities, while implementation of the proposed project includes development of new facilities that would require the alteration of existing onsite electric power, natural gas, and telecommunications facilities, such as relocating/rerouting existing electric power, natural gas, and telecommunications lines where new development is proposed, it is anticipated that such electric power, natural gas, and telecommunications facility improvements would occur in conjunction with the development of the project components and would not result in significant environmental effects on their own. It should also be noted that, as indicated in Table 4 in Section XXI.b below, LAWA is proposing to construct a new electrical Receiving Station “X” (RS-X) and associated electrical infrastructure improvements in order to address persistent power reliability and capacity issues at LAX. The new RS-X would be located in the northwest corner of LAX property, near the intersection of Westchester Parkway and Pershing Drive, and would accommodate the electrical demand of future infrastructure projects at LAX, including the Airfield and Terminal Modernization Project. The new RS-X is envisioned to be a purpose-built structure, designed to accommodate 120 megavolt amperes (MVA) redundant capacity. In summary, construction of electric power, natural gas, and telecommunications facilities improvements associated with the proposed project is not anticipated to cause significant environmental effects and no further evaluation in the EIR is required.

b. Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?

Potentially Significant Impact. As noted in Section 3.1.4, LADWP is the water purveyor for the project site. LADWP is responsible for supplying, treating, and distributing water within the City. LADWP has an adopted Urban Water Management Plan (2015) that indicates that water supplies in the City will be sufficient to meet projected demands through 2040.¹⁰³ According to LADWP, it has met the immediate needs of its customers and is well positioned to continue to do so in the future.¹⁰⁴

The proposed Concourse 0 and Terminal 9 facilities could result in an increased demand for water. As discussed in Section 3.3, LAWA Design and Construction Practices, the proposed project would be designed to achieve a USGBC’s LEED® Silver certification, including measures to reduce water consumption.

¹⁰³ City of Los Angeles, Department of Water and Power, *2015 Urban Water Management Plan*, June 2016.

¹⁰⁴ City of Los Angeles, Department of Water and Power, *2015 Urban Water Management Plan*, June 2016.

Construction of new water lines to serve the proposed project facilities may be required. The water demand associated with the proposed project in relation to available water supplies and the impact of constructing new water lines will be evaluated in the EIR.

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

No Impact. LADWP's Department of Sanitation (LA Sanitation or LASAN) is responsible for operating and maintaining the City's wastewater collection and treatment system. Sanitary wastewater generated by activities at LAX is treated at the Hyperion Water Reclamation Plant (HWRP). In April 2018, the City of Los Angeles published the *Final Draft One Water LA 2040 Plan*, which "takes a holistic and collaborative approach to consider all of the City's water resources from surface water, groundwater, potable water, wastewater, recycled water, dry-weather runoff, and stormwater as 'One Water'."¹⁰⁵ According to the Plan, the capacity of HWRP is 450 million gallons per day (mgd); wastewater flows at HWRP are projected to be 283 mgd in 2040.¹⁰⁶ HWRP would have sufficient capacity to serve the proposed project's demand in addition to LASAN's existing commitments, and no further evaluation in the EIR is required.

d. Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

e. Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. Demolition of the onsite facilities would result in the generation of approximately 92,500 cubic yards of building material, approximately 486,000 cubic yards of apron material (combination of Portland concrete cement, asphalt concrete, emulsified asphalt treated base, and crushed aggregate), and approximately 227,000 cubic yards of asphalt from paved parking areas. During construction, some of the construction debris may be able to be reused on the project site. Construction debris that cannot be reused onsite would be recycled off-site or disposed of at a facility permitted to accept inert solid waste (e.g., concrete and asphalt from construction and demolition activities). Overall, non-hazardous construction and demolition debris generated at the site would be recycled or salvaged to the extent required to meet LEED® Silver certification. The total remaining permitted inert (or unclassified landfill) waste capacity in Los Angeles County was estimated to be approximately 56.34 million tons in 2016 (excluding inert debris disposal sites).^{107,108} Based on the average countywide 2016 disposal rate of 1,183 tons per day (tpd), this capacity would be exhausted in 153 years.¹⁰⁹ Therefore, there is no projected shortfall in disposal capacity for inert waste within Los Angeles County. See Sections IX.a-b above regarding disposal of hazardous wastes.

¹⁰⁵ City of Los Angeles, Department of Water and Power, LA Sanitation, *Final Draft One Water LA 2040 Plan, Volume 2 Wastewater Facilities Plan*, prepared by Stantec in collaboration with Carollo, April 2018. Available: https://www.lacitysan.org/cs/groups/sg_owla/documents/document/y250/mdi2/~edisp/cnt026205.pdf.

¹⁰⁶ City of Los Angeles, Department of Water and Power, LA Sanitation, *Final Draft One Water LA 2040 Plan, Volume 2 Wastewater Facilities Plan*, prepared by Stantec in collaboration with Carollo, April 2018. Available: https://www.lacitysan.org/cs/groups/sg_owla/documents/document/y250/mdi2/~edisp/cnt026205.pdf.

¹⁰⁷ Inert waste is waste that does not undergo any significant physical, chemical, or biological transformations. Examples of inert waste include construction and demolition debris.

¹⁰⁸ County of Los Angeles, Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan 2016 Annual Report*, September 2017. Available: <https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF>.

¹⁰⁹ County of Los Angeles, Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management*

Solid waste generated at LAX is disposed of at the Sunshine Canyon Landfill. The Sunshine Canyon Landfill is a Class III landfill located at 14747 San Fernando Road in Sylmar, California, approximately 35 miles from the project site. Sunshine Canyon Landfill is owned and operated by Republic Services, Inc., and has a maximum permitted throughput of 12,100 tons per day.¹¹⁰ As of December 31, 2016, this facility had a remaining capacity of 62,083,650 cubic yards, and currently has an estimated closure date of 2037.¹¹¹ The waste types accepted at this facility include construction and demolition debris, green materials, industrial, inert, and mixed municipal waste. Operation of the proposed new Concourse 0 and Terminal 9 would increase overall solid waste generation at LAX. The proposed project would be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs and would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, including provisions pertaining to recycling. The proposed project would be designed to provide space to support recycling efforts, including area for depositing, storing, and collecting materials for recycling.

Transport of hazardous materials, including hazardous building materials such as ACM and LBP, off-site would be performed by licensed hazardous waste haulers. Disposal would comply with applicable local, state, and federal regulations governing disposal of hazardous materials, including disposal at a properly certified facility; these regulations are designed to prevent hazardous waste transportation and disposal from causing significant hazards to the public and the environment.

Kettleman Hills Landfill, Buttonwillow, or another Class I landfill in the United States would be utilized for disposal of hazardous waste, based on facility and hazardous material requirements. ACMs are classified as non-hazardous waste and are not federally regulated (i.e., not regulated under the RCRA [non-RCRA-Hazardous waste]); however, only certain facilities accept this type of waste, such as the Azusa Land Reclamation Management Facility. Construction debris contaminated with lead must be tested to determine proper disposal options. Depending on the concentration levels, it may be disposed as construction debris or may require disposal as a RCRA hazardous waste or non-RCRA hazardous waste.

Because the proposed project would not generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals, and solid waste generation and disposal would comply with federal, state, and local management and reduction statutes and regulations related to solid waste, impacts related to solid waste disposal would be less than significant with the implementation of the proposed project and no further evaluation of solid waste impacts in the EIR is required.

XX. WILDFIRE.

If located in or near State responsibility areas or lands classified as very high fire hazard severity zones, would the project:

- a. Substantially impair an adopted emergency response plan or emergency evacuation plan?**

Plan 2016 Annual Report, September 2017. Available:

<https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF>.

¹¹⁰ County of Los Angeles, Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan 2016 Annual Report*, September 2017. Available:

<https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF>.

¹¹¹ County of Los Angeles, Department of Public Works, *County of Los Angeles Countywide Integrated Waste Management Plan 2016 Annual Report*, September 2017. Available:

<https://dpw.lacounty.gov/epd/swims/ShowDoc.aspx?id=6530&hp=yes&type=PDF>.

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

No Impact. As indicated in Section IX.g above, the project site is located within a developed airport and surrounded by airport uses, urbanized areas, and the Los Angeles/El Segundo Dunes. There are no fire hazard areas containing flammable brush or grass on the project site. Furthermore, the project site is not within a City of Los Angeles Wildfire Hazard Area, as delineated in the Safety Element of the General Plan.¹¹² As such, the project site is not located in or near State responsibility areas or lands classified as very high fire hazard severity zones and no further evaluation of wildfire-related impacts in the EIR is required.

XXI. MANDATORY FINDINGS OF SIGNIFICANCE.

- a. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?**

Potentially Significant Impact. As discussed under Section IV (Biological Resources), the proposed project is located in highly-developed areas within LAX. There are no plant or animal species listed on any state or federal lists of endangered, threatened, or special status species, or riparian/wetland areas, or native trees within the project site. Therefore, the proposed project would not substantially reduce the habitat of fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal and no further evaluation in the EIR is required.

There are no known archaeological or paleontological located on the project site, and the disturbed nature of the site makes the site's sensitivity to such resources low. As discussed under Sections V.b and VII.f above, archaeological and paleontological resources have been found at other locations within the airport property, and the potential exists for the destruction of previously unidentified buried archaeological or paleontological resources at the project site during construction, if such resources are present. In consideration of the fact that existing LAWA plans, policies, and procedures would be required to be implemented as part of the proposed project, impacts to archaeological and paleontological resources would be less than significant. Therefore, no further evaluation of impacts to archaeological and paleontological resources in the EIR is required.

¹¹² City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit D, Selected Wildfire Hazard Areas In the City of Los Angeles, April 1996.

As described in Section V.a, there is the potential for construction activities associated with the proposed roadway improvements to indirectly impact nearby significant historical resources, such as the 1961 Airport Traffic Control Tower within the CTA, the Aircraft School Property located at 9700 S. Sepulveda Boulevard, the Union Savings and Loan Building at 9800 S. Sepulveda Boulevard, or the McCulloch Building at 6151 W. Century Boulevard. Indirect impacts could include structural damage from construction-related vibration. The EIR will evaluate the potential for the proposed project to eliminate important examples of the major periods of California history, and determine whether the project would cause a substantial adverse change in the significance of a historical resource defined by State CEQA Guidelines Section 15064.5.

As discussed in Section XVIII.a, there are no known tribal cultural resources, as defined in Public Resources Code 21074, on the project site or in the immediate vicinity. An SLF records search was completed by NAHC with positive results. LAWA contacted a representative of the Gabrielino Tongva Indians of California Tribal Council to discuss the SLF records search. The representative did not identify specific sacred resources or other tribal cultural resources that would be affected by the proposed project. In accordance with AB 52, one tribe has indicated to LAWA that it wishes to be notified of projects within its traditionally and culturally affiliated areas, as required by Public Resources Code Section 21080.3.1(b). On December 6, 2018, LAWA sent a project notification letter and map to the tribe. The letter included information such as project location, a brief description of the proposed project, and results of a previous cultural resources assessment in the project area. No response was received from the tribe requesting consultation. Operations of the proposed project would not result in any impacts to tribal cultural resources. Given that there are no known tribal cultural resources at the project site or in the vicinity, the discovery of tribal cultural resources within the project site during construction is unlikely. Moreover, LAWA has developed and adopted plans, policies, and procedures that address potential impacts to archaeological resources, which are documented in LAWA's ATP. These plans, policies, and procedures include notification of the NAHC and retention of a Native American monitor if/as recommended by NAHC if a potentially significant or unique Native American archaeological resources or human remains are encountered during construction. LAWA requires all construction projects at LAX to comply with the ATP, and will apply this requirement to the proposed project. These measures would also address potential impacts on tribal cultural resources. By adhering to the ATP, impacts to tribal cultural resources would be less than significant and no further evaluation in the EIR is required.

b. Does the project have impacts which are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects).

Potentially Significant Impact. Cumulative impacts are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts."¹¹³ Section 15130(b) of the State CEQA Guidelines sets forth two approaches for analyzing cumulative impacts:

- A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency, or

¹¹³ 14 California Code of Regulations, Section 15355, *Cumulative Impacts*.

- A summary of projections contained in an adopted local, regional or statewide plan, or related planning document, that describes or evaluates conditions contributing to the cumulative effect. Such plans may include a general plan, regional transportation plan, or plans for the reduction of GHG emissions. A summary of projections may also be contained in an adopted or certified prior environmental document for such a plan. Such projections may be supplemented with additional information such as a regional modeling program.

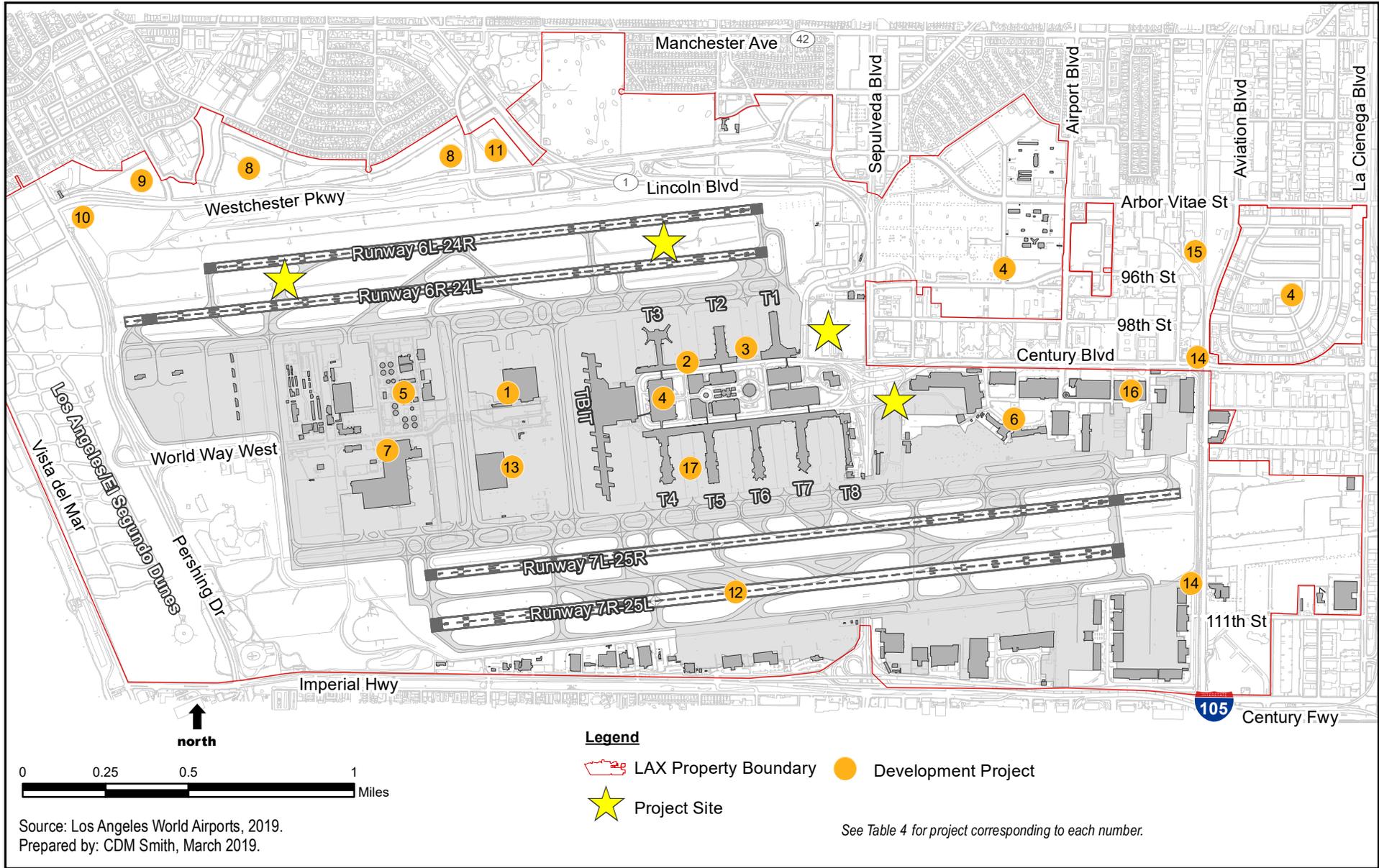
To evaluate the proposed project’s contribution to cumulative impacts, this Initial Study uses the first of the two options, commonly referred to as "the list approach," to identify cumulative development projects for analyzing cumulative impacts. Projects at/adjacent to LAX are listed in **Table 4**, which includes projects on the airport and areas immediately adjacent to the airport, whose development may result in cumulative impacts. A description of each project is also provided in Table 4. The projects listed in Table 4 were considered in the cumulative impacts analysis below.

	Project	Expected Dates	Description
1	LAX Midfield Satellite Concourse North Project	Apr 2015 – June 2020	The Midfield Satellite Concourse (MSC) North Project consists of a satellite concourse west of TBIT that will include up to 12 aircraft gates that could accommodate ADG V and ADG VI aircraft. The MSC North Project includes associated apron areas, a new crossfield taxiway, a taxilane, and provisions for an underground tunnel.
2	Terminals 2 and 3 Modernization Project	Sep 2017 – June 2023	Improvements to Terminals 2 and 3, consisting of upgrading the Terminal 2 concourse, including construction of additional floor area; the demolition and reconstruction of the Terminal 3 concourse building to provide additional concourse area, including a new operation control center; the demolition of the southern appendages of the Terminal 3 satellite; the demolition and reconstruction of the passenger and baggage processing facilities (ticketing buildings) at Terminals 2 and 3, including new facilities for passenger and baggage screening, ticketing, and baggage claim; and a secure connector between Terminals 2 and 3.
3	Terminal 1.5	Oct 2017 – Oct 2020	Terminal 1.5 will be constructed between existing Terminal 1 and Terminal 2 to provide additional passenger processing facilities for the north passenger terminals.
4	LAX Landside Access Modernization Program ¹	Late 2017 – Dec 2035	Improvements within and east of the CTA to improve access options and the travel experience for passengers; provide a direct connection to the Metro transit system; provide easier and more efficient access to rental cars; relieve congestion in the CTA and on the surrounding street system; and improve the efficiency and operation of the transportation system serving LAX. The program components include 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 CTA, and roadway improvements. Additionally, certain parcels in the local area would become available for redevelopment with new uses as a result of the Landside Access Modernization Program. ¹
5	LAX Fuel Tank Installation	1st Quarter 2018 – July 2019	The LAX Fuel Tank Installation project consists of the addition of four new 60,000 barrel (bbl) gross capacity above ground fuel storage tanks at the existing LAXFUEL leasehold on the west side of LAX. The project includes improvements to add these additional four tanks, including associated site work, piping, and electrical modifications.

Table 4 Development Projects At/Adjacent to LAX			
	Project	Expected Dates	Description
6	United Airlines East Aircraft Maintenance and GSE Project	Feb 2019 – Feb 2021	Consolidation of United Airlines' existing maintenance operations into a new facility on the east side of the airport, on the site of the existing Maintenance Operations Center.
7	Secured Area Access Post (SAAP) Project	2019 – 2020 ²	Construction of a fully functional, secured access point onto the Airport Operations Area (AOA) on the west side of LAX. This will be the sole full-access SAAP on World Way West to replace SAAP 5 which was displaced in January 2016 by the MSC North Project, and SAAP 21, which was taken out of service by Phase 2 of the WAMA Project in May 2017. 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 North Project is completed.
8	LAX Northside Development	Apr 2016 – June 2025	The Northside Development will transform approximately 340 acres of land on the north side of the airport with up to 2,320,000 square feet of development to better serve LAWA and the local communities of Westchester and Playa del Rey. Permitted uses include recreation and open space; office, research, and development; community and civic; commercial; airport support; and landscape buffer.
9	Argo Drain Sub-Basin Stormwater Infiltration and Treatment Facility (part of LAX Northside Development)	Sept 2018 – Oct 2020	Also referred to as the Westchester Stormwater Best Management Practices Project, this project would develop a 22-acre stormwater infiltration facility north of Westchester Parkway and east of Pershing Drive that would treat both City of Los Angeles and LAWA stormwater flows from the Argo watershed.
10	Receiving Station X (part of LAX Northside Development)	Oct 2019 – May 2023	The proposed Receiving Station X (RS-X) would be located in the northwest corner of LAX property, near the intersection of Westchester Parkway and Pershing Drive. The RS-X would address power reliability issues, provide redundancy in the case of power outages, and accommodate the electrical demand of future infrastructure projects at LAX. The new RS-X is envisioned to be a purpose-built structure, designed to accommodate 120 megavolt amperes (MVA) redundant capacity. The proposed RS-X would include the installation of a new receiving station and installation of feeders.
11	Airport Police Facility (part of LAX Northside Development)	May 2019 – June 2021	Relocation of LAWA Police Department to consolidate facilities into one location in LAX Northside, which will include the police headquarters, shooting range, canine facility, and parking structure.
12	Runway 7R-25L Rehabilitation	Sep 2020 – June 2021	Reconstruction of runway pavement.
13	MSC South Project	2020 – 2023	The MSC South concourse would be constructed on the south end of the MSC North concourse in order to provide additional aircraft gates.
14	Metro Crenshaw/LAX Transit Corridor Project	Jan 2015 – 2020	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, a station is being constructed in proximity to LAX near the intersection of Century Boulevard and Aviation Boulevard.

Table 4 Development Projects At/Adjacent to LAX			
	Project	Expected Dates	Description
15	Airport Metro Connector 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 Airport Metro Connector (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.
16	Cargo Redevelopment Project	1st Quarter 2022 – 4th Quarter 2023	Modernization of existing cargo facilities the air cargo complex at LAX along the Century Boulevard corridor. It is anticipated that the eventual newly-developed warehouse capacity, once the development is complete and fully built out, may be up to approximately 700,000 square feet. In total, the project site includes up to approximately 60 acres, a portion of which is to be dedicated to aeronautical ramp for Remain Overnight (RON) passenger aircraft parking.
17	Terminal 4/5 Modernization Program	2021 – 2028 ³	The Terminal 4/5 Modernization Program will renovate and/or replace portions of the existing concourse in order to enhance the guest experience and improve amenities, such as concessions and restrooms. The Program will replace aging building infrastructure and systems.
NA	Miscellaneous Projects and Improvements	Jan 2014 – July 2020	A wide variety of smaller miscellaneous projects and improvements mostly related to repair/replacement of, and upgrades to, existing facilities at LAX, including, but not limited to, runway repair/rehabilitation; elevators/escalators replacement; CTA second level roadway repairs; terminal taxilanes and aprons rehabilitation; passenger boarding bridge replacements; terminal electrical, plumbing, and facilities upgrades; miscellaneous demolition; and other improvements.
Sources: LAWA, 2019; Los Angeles County Metropolitan Transportation Authority, <i>The Source</i> , December 6, 2018.			
Notes:			
<ol style="list-style-type: none"> ¹ There are no current proposals or plans regarding what types or amounts of development may occur on the parcels that would be available for other uses as a result of the proposed Landside Access Modernization Program (i.e., the Potential Future Related Development described in the EIR for the Landside Access Modernization Program). Further planning, assessment, and other efforts would be needed. Thus, particular uses and development are not reasonably foreseeable at this time. ² The proposed SAAP project would take approximately 13 months for demolition and construction. Demolition and construction may not be continuous; the 13 months of overall construction activity is estimated to occur in the timeframe between 2019 and 2020. ³ Construction dates are subject to change. 			

Figure 29 illustrates the location of the projects in Table 4 in relationship to the project site. Miscellaneous Projects and Improvements are not on the figure because they occur at multiple locations throughout the airport.



LAX Airfield and Terminal Modernization Project

Cumulative Development Projects At/Adjacent to LAX

Figure
29

The environmental analyses in the sections above indicates that the proposed project would have no impact on agriculture and forestry resources, biological resources, mineral resources, parks, other public facilities, recreation, and wildfire. Therefore, the proposed project would not have the potential to contribute to possible cumulative impacts to these resources and no further evaluation in the EIR is required.

The environmental analyses in the sections above determined that implementation of the proposed project would have less than significant impacts on aesthetics, cultural resources (archaeological resources), geology and soils, hydrology and water quality, population and housing, public services (fire and police protection and schools) and tribal cultural resources. The potential for the proposed project to contribute to significant cumulative impacts to these resources is addressed below.

Aesthetics

The proposed project would be visually consistent with existing adjacent airport-related uses and would not create a new source of substantial light and glare which would adversely affect day or nighttime views in the area. The proposed project would not conflict with applicable zoning and would be consistent with other regulations governing scenic quality, including the LAX Design Guidelines. Therefore, impacts to aesthetics would not be cumulatively significant and the proposed project would not contribute to a significant cumulative impact related to aesthetics. No further evaluation in the EIR is required.

Archaeological Resources

The environmental analyses above determined that implementation of existing LAWA plans, policies, and procedures, which would be required to be implemented as part of the proposed project, would ensure that any potential impacts to archaeological resources from construction of the proposed project would be less than significant. Implementation of these plans, policies, and procedures would also apply to cumulative development projects at LAX. With implementation of these plans, policies, and procedures, impacts to archaeological resources would not be cumulatively significant and the proposed project would not contribute to a significant cumulative impact on archaeological resources. No further evaluation in the EIR is required.

Geology and Soils

As with the proposed project, projects listed in Table 4 would comply with state and local requirements and guidelines (e.g., LABC and UBC requirements) to minimize potential risks and hazards associated with geology and soils). Moreover, risks and hazards associated with geology and soils are site-specific and not considered cumulative in nature. The environmental analyses above determined that implementation of existing LAWA plans, policies, and procedures, which would be required to be implemented as part of the proposed project, would ensure that any potential impacts to paleontological resources from construction of the proposed project would be less than significant. Implementation of these plans, policies, and procedures would also apply to cumulative development projects. With implementation of these plans, policies, and procedures, cumulative impacts to paleontological resources would not be cumulatively significant and the proposed project would not contribute to a significant cumulative impact on paleontological resources. Therefore, impacts to geology and soils, including unique paleontological resources, would not be cumulatively significant and the proposed project would not contribute to a significant cumulative impact related to geology and soils. No further evaluation in the EIR is required.

Hydrology and Water Quality

As with the proposed project, projects listed in Table 4 would comply with state and local requirements and guidelines to minimize or avoid hydrology/water quality impacts (i.e., compliance with the State Construction General Permit, the State Industrial General Permit, and the LARWQCB SUSMP, preparation of a SWPPP to address construction-related surface water quality impacts and delineate water quality control measures [i.e., BMPs] and/or LID practices to address impacts). Therefore, impacts to hydrology and water quality would not be cumulatively significant and the proposed project would not contribute to a significant cumulative impact related to hydrology and water quality. No further evaluation in the EIR is required.

Population and Housing

The proposed project and other nearby development would not establish new residential uses. Cumulative projects, including the proposed project, would increase employment opportunities. This growth in employment opportunities would occur within an existing urbanized area that has established infrastructure, a well-developed transportation network, existing housing stock, and existing public services. Given that the area is part of a well-established urban community connected by an existing transportation network and with a large labor pool and housing market, the combined projects are not expected to result in the need for new housing in the project vicinity or the region. Therefore, impacts would be less than significant and the proposed project would not contribute to a significant cumulative impact related to population and housing. As a result, no further evaluation in the EIR is required.

Public Services

Regarding fire and police protection, none of the cumulative projects, including the proposed project, include residential uses nor would they increase long-term employment such that they would result in need for new or altered police or fire stations or related facilities, the construction of which could lead to a substantial adverse physical impact. As such, impacts related to police or fire protection services would not be cumulatively significant and the proposed project would not contribute to a significant cumulative impact related to public services. No further evaluation in the EIR is required.

Regarding schools, as discussed in Section XV.c above, the proposed project would require the acquisition of a Los Angeles Community College District property. Acquisition of this facility would require the Los Angeles Community College District to relocate the warehousing use and related instructional function. The current facility is not located on an existing school campus; rather, it is located in a commercial area characterized by aviation uses, hotels, surface and structured parking, and other similar uses. It is reasonable to assume that the facility could be relocated to another commercial or light industrial parcel without adversely affecting the performance objectives of the facility. Such commercial and light industrial properties are readily available in the greater project area.¹¹⁴ Therefore, acquisition of the facility would not result in the need for a new facility, the construction of which could cause significant environmental impacts. Regarding cumulative projects, two schools located within the Manchester Square area, the Stella Middle School and Bright Start Secondary Charter Academies, would be relocated as part of LAWA's existing Aircraft Noise Mitigation Program (ANMP) or the LAX Landside Access Modernization Program. The two schools are a tenant of the Los Angeles Unified School District. Mitigation was included in the Landside Access Modernization Program EIR and associated Mitigation Monitoring and Reporting Program to reduce impacts

¹¹⁴ LoopNet website. Available: <https://www.loopnet.com/for-lease/multiple-property-types/?sk=6f664f4b265bee26fa5c11b161fadbf2&bb=uvn2i73snNvw3k44H> and <https://www.loopnet.com/for-sale/multiple-property-types/?sk=b1962dc57c46f1b818da7245ea3e3ad7&bb=uvn2i73snNvw3k44H>, accessed February 6, 2019.

associated with relocation of the two charter schools to a level that is less than significant. Regarding indirect impacts to schools, none of the cumulative projects, including the proposed project, include residential development nor would they increase long-term employment at LAX to the extent that indirect growth would result in enrollment increases that would adversely impact schools. As such, cumulative impacts on schools would not be cumulatively significant and the proposed project would not contribute to a significant cumulative impact related to schools. No further evaluation in the EIR is required.

Tribal Cultural Resources

The environmental analyses above determined that implementation of existing LAWA plans, policies, and procedures, which would be required to be implemented as part of the proposed project, would ensure that any potential impacts to tribal cultural resources from construction of the proposed project would be less than significant. Implementation of these plans, policies, and procedures would also apply to cumulative development projects at LAX. With implementation of these plans, policies, and procedures, impacts to tribal cultural resources would not be cumulatively significant and the proposed project would not contribute to a significant cumulative impact on tribal cultural resources. No further evaluation in the EIR is required.

Potentially Significant Cumulative Impacts

Finally, the environmental analyses above determined that the proposed project would result in potentially significant impacts on air quality, cultural resources (historical resources), energy, GHG emissions, hazards and hazardous materials, land use and planning, noise, transportation, and utilities and service systems. As such, the EIR will address potential impacts to these resources, including evaluation of potential cumulative effects and the potential of the proposed project to make a cumulatively considerable contribution to cumulative impacts.

c. Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?

Potentially Significant Impact. Based on the analysis in this Initial Study, the proposed project would have the potential to result in potentially significant air quality, energy, GHG emissions, hazards and hazardous materials, land use and planning, noise, transportation, and utilities and service systems impacts, which could potentially result in substantial adverse effects on human beings. The potential for the proposed project to result in such impacts will be evaluated in the EIR.

Based on the analysis in this Initial Study, the proposed project would not have any environmental effects which could cause substantial adverse effects on human beings, either directly or indirectly, related to cultural resources (archaeological resources), geology and soils, population and housing, public services, recreation, tribal cultural resources, and wildfire. Therefore, impacts to these resource areas would be less than significant and no further evaluation in the EIR is required.

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All documents listed below are available for public inspection at the following location:

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6053 Century Boulevard, Suite 1050
Los Angeles, California 90045

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City of Los Angeles

Los Angeles World Airports

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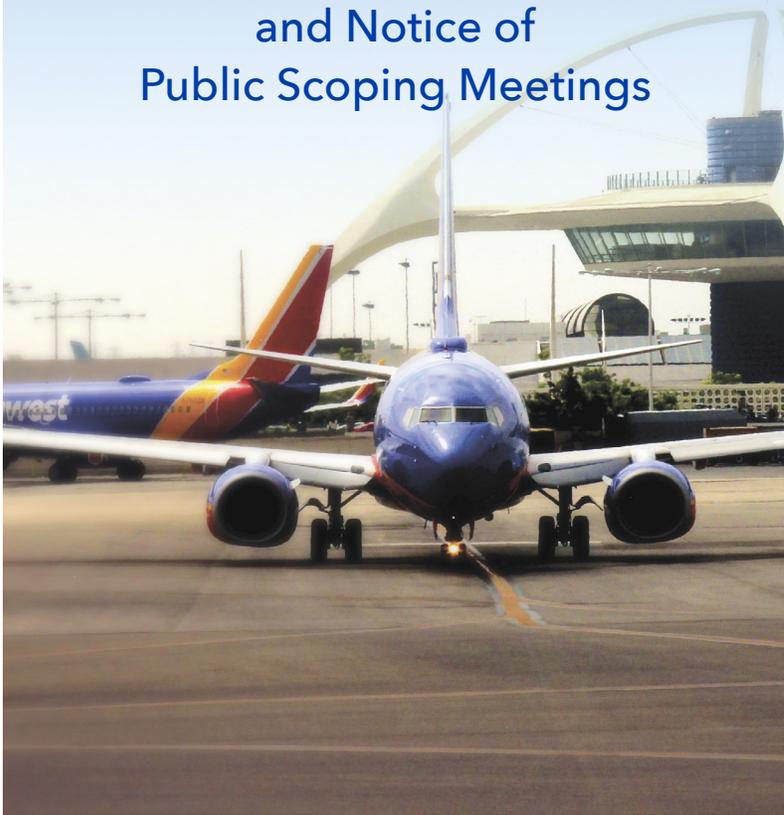
Appendix A.2 Scoping Meeting Materials

- Mailer
- eBlasts
- Fact Sheet
- Scoping Meeting Boards
- Scoping Meeting Sign-in Sheets (April 13, 2019)
- Scoping Meeting Sign-in Sheets (April 17, 2019)

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We Want to Hear From You

Release of Notice of Preparation and Notice of Public Scoping Meetings



AIRFIELD & TERMINAL MODERNIZATION PROJECT

Los Angeles World Airports (LAWA) has prepared a Notice of Preparation/Initial Study (NOP/IS) for the LAX Airfield and Terminal Modernization Project, pursuant to the California Environmental Quality Act (CEQA). Under CEQA, the City finds that the proposed project may have a significant effect on the environment and an environmental impact report (EIR) will be prepared.

LAWA released the NOP on April 4, 2019, and is seeking your input regarding the scope and content of environmental issues to be addressed in the EIR at two public scoping meetings. LAWA invites you to make your voice heard by submitting comments at the scoping meetings or via any of our contact tools by Monday, May 6, 2019.

Public Scoping Meetings

Saturday, April 13, 2019

10:00 a.m. to 12:00 p.m.

Flight Path Museum & Learning Center

6661 W. Imperial Hwy., Los Angeles, CA 90045

Wednesday, April 17, 2019

6:00 p.m. to 8:00 p.m.

Westchester Senior Citizen Center

8740 Lincoln Blvd., Los Angeles, CA 90045


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

We'd like to hear from you. You can provide your feedback, contact LAWA, or access project information via any of the following information sources:



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Chief of Airport Planning II
Los Angeles World Airports
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Los Angeles, California 90009-2216
Phone: (800) 919-3766

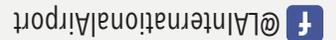


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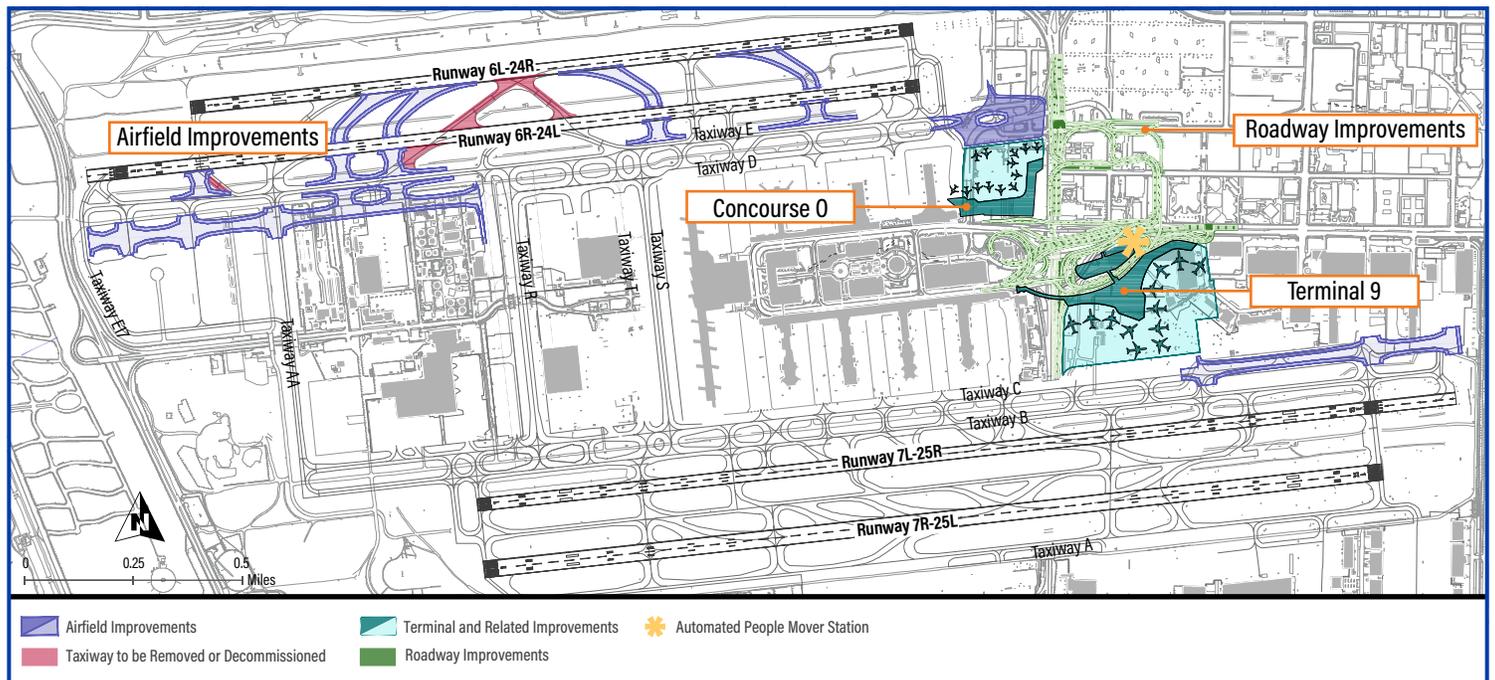
AIRFIELD & TERMINAL MODERNIZATION PROJECT

PROJECT DESCRIPTION

LAWA is proposing to implement the LAX Airfield and Terminal Modernization Project ("project") as part of LAWA's continuing commitment to maintain LAX as a world-class airport. The project consists of several primary elements, including airfield enhancements to increase 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.

PROJECT COMPONENTS

- Airfield Improvements (North Airfield).** Airfield safety and efficiency would be enhanced with the westerly extension of Taxiway D and the reconfiguration of runway exits from the northernmost runway. Remote gates on the western side of the airport would be removed.
- Terminal Improvements.** Concourse 0 and Terminal 9 would be constructed to replace remote gates that would be eliminated by the proposed Taxiway D westerly extension. Concourse 0 would be an 11-gate concourse facility (net increase of 9 gates) east of Terminal 1. Terminal 9 would be a new 12-gate international and domestic passenger terminal southeast of the Sepulveda/Century Boulevard intersection. 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. Convenient access to Terminal 9 would be provided by a new Automated People Mover (APM) station and a pedestrian bridge across Sepulveda Boulevard linking Terminals 8 and 9.



REPORT AVAILABILITY

The NOP/IS is available for review on the LAWA website www.lawa.org/ATMP, at the Los Angeles City Clerk, 200 N. Spring Street, Suite 360, Los Angeles, CA 90012, and at the following additional locations:

LAWA's Administrative Office
6053 Century Boulevard, Suite 1050
Los Angeles, CA 90045

El Segundo Public Library
111 W. Mariposa Avenue
El Segundo, CA 90245

Playa Vista Branch Library
6400 Playa Vista Drive
Los Angeles, CA 90094

Lennox Library
4359 Lennox Boulevard
Lennox, CA 90304

Westchester-Loyola Village Branch Library
7114 W. Manchester Avenue
Los Angeles, CA 90045

Culver City Library
4975 Overland Avenue
Culver City, CA 90230

Inglewood Public Library
101 W. Manchester Boulevard
Inglewood, CA 90301

Hawthorne Library
12700 Grevillea Avenue
Hawthorne, CA 90250

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From: Los Angeles World Airports <laxstakeholderliaison@lawa.org>
Sent: Thursday, April 04, 2019 8:44 AM
Subject: Notice: Airfield and Terminal Modernization Project at LAX

AIRFIELD & TERMINAL MODERNIZATION PROJECT



Release of Notice of Preparation & Notice of Public Scoping Meetings

Los Angeles World Airports (LAWA) has prepared a Notice of Preparation/Initial Study (NOP/IS) for the LAX Airfield and Terminal Modernization Project, pursuant to the California Environmental Quality Act (CEQA). Under CEQA, the City finds that the proposed project may have a significant effect on the environment and an environmental impact report (EIR) will be prepared.

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Project Components



Airfield Improvements (North Airfield)

Terminal Improvements

Concourse 0 and Terminal 9 would be constructed to replace remote gates that

Airfield safety and efficiency would be enhanced with the westerly extension of Taxiway D and the reconfiguration of runway exits from the northernmost runway. Remote gates on the western side of the airport would be removed.

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From: Los Angeles World Airports <laxstakeholderliaison@lawa.org>
Sent: Tuesday, April 23, 2019 12:20 PM
Subject: Airfield and Terminal Modernization Project at LAX

AIRFIELD & TERMINAL MODERNIZATION PROJECT



Thank You for Participating!



Los Angeles World Airports (LAWA) thanks you for your participating in the Public Scoping Meetings held on Saturday, April 13, 2019 and Wednesday, April 17, 2019 for the LAX Airfield and Modernization Project.

You can click on the links below to access the meeting materials.

- [Display Boards](#)

- [Fact Sheet](#)

The Notice of Preparation (NOP) for the project was released on April 4, 2019 and LAWA is seeking your input regarding the scope and content of environmental issues to be addressed in the EIR.

LAWA invites you to continue to make your voice heard by submitting comments by Monday, May 6, 2019. Comments can be submitted online by visiting the project website at lawa.org/ATMP.

Report Availability

The NOP/IS is available for review on the LAWA website lawa.org/ATMP, at the Los Angeles City Clerk, 200 N. Spring Street, Suite 360, Los Angeles, CA 90012, and at the following locations:

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Environmental Review Process and Estimated Schedule

The LAX Airfield and Terminal Modernization Project requires federal and local approval, as well as environmental clearance as outlined by the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA).

CEQA Timeline



NEPA Timeline



Get Involved

Los Angeles World Airports has initiated a public involvement effort for the LAX Airfield and Terminal Modernization Project to communicate information about the Project and provide opportunities for public input during the environmental review process.

All Project details will be available via the Project website. Use the website to:

- Learn about upcoming workshops/meetings
- Comment on environmental documents
- Request a presentation
- Subscribe to the Project mailing list

Project Website: WWW.LAWA.ORG/ATMP

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AIRFIELD & TERMINAL MODERNIZATION PROJECT

FACT SHEET

The Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project will focus on airfield, terminal and landside improvements, while staying within the airport's existing footprint. The Project would elevate the passenger experience, improve the community experience, enhance safety and increase business opportunities.

What are the proposed improvements?

Airfield Improvements



- Reconfigures taxiways and runway exits to meet current FAA design standards
- Improves runway exit configurations to enhance pilot visibility
- Extends Taxiway D westerly for operational efficiency and to meet FAA standards
- Improves Taxiways C & D for access to new terminal facilities

Reduces wait times on tarmac; reduces aircraft idling, decreasing emissions

Terminal Improvements



- Terminal 9: 12-gate facility
- Concourse 0: 11-gate facility (9 new gates)
- Provides full-service international capabilities
- Replaces west remote gates

Provides a better guest experience (extra seating, check-in areas, security screening, charging stations, etc.)

Landside Improvements



- Improves Central Terminal Area access and reduces congestion on nearby public roads
- Creates direct access for Terminal 9
- Adds a new Automated People Mover Train Station at Terminal 9 which will link to regional mass transit

Reduces congestion on neighborhood streets and provides more user-friendly airport access

Why are we proposing it?

As part of LAX's continuing commitment to maintain a gold-standard airport, the Airfield and Terminal Modernization Project will provide for a combination of airfield, terminal and landside improvements that will address safety, sustainability and reliability in the following ways.

IMPROVES PASSENGER EXPERIENCE



- Provides a better passenger experience than remote gates—more seating and concessions not currently available at remote gates
- Reduces wait times on the tarmac
- Transitions seamlessly between international and domestic flights

ENHANCES SAFETY & CARRIER EXPERIENCE



- Increases operational efficiency which reduces delays and enhances safety
- Reduces wait times on the tarmac
- Removes remote gates—less busing
- Improves taxiways
- Enhances aircraft movement

INCREASES BUSINESS OPPORTUNITIES



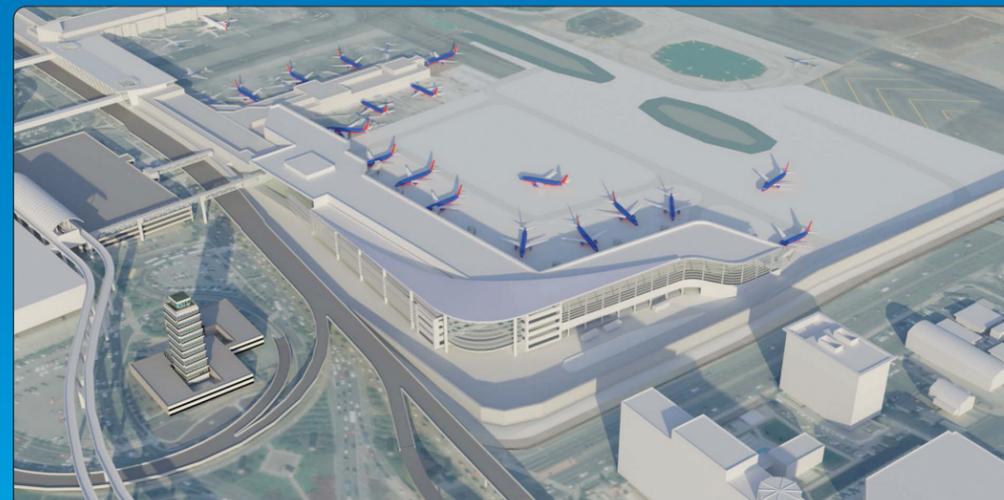
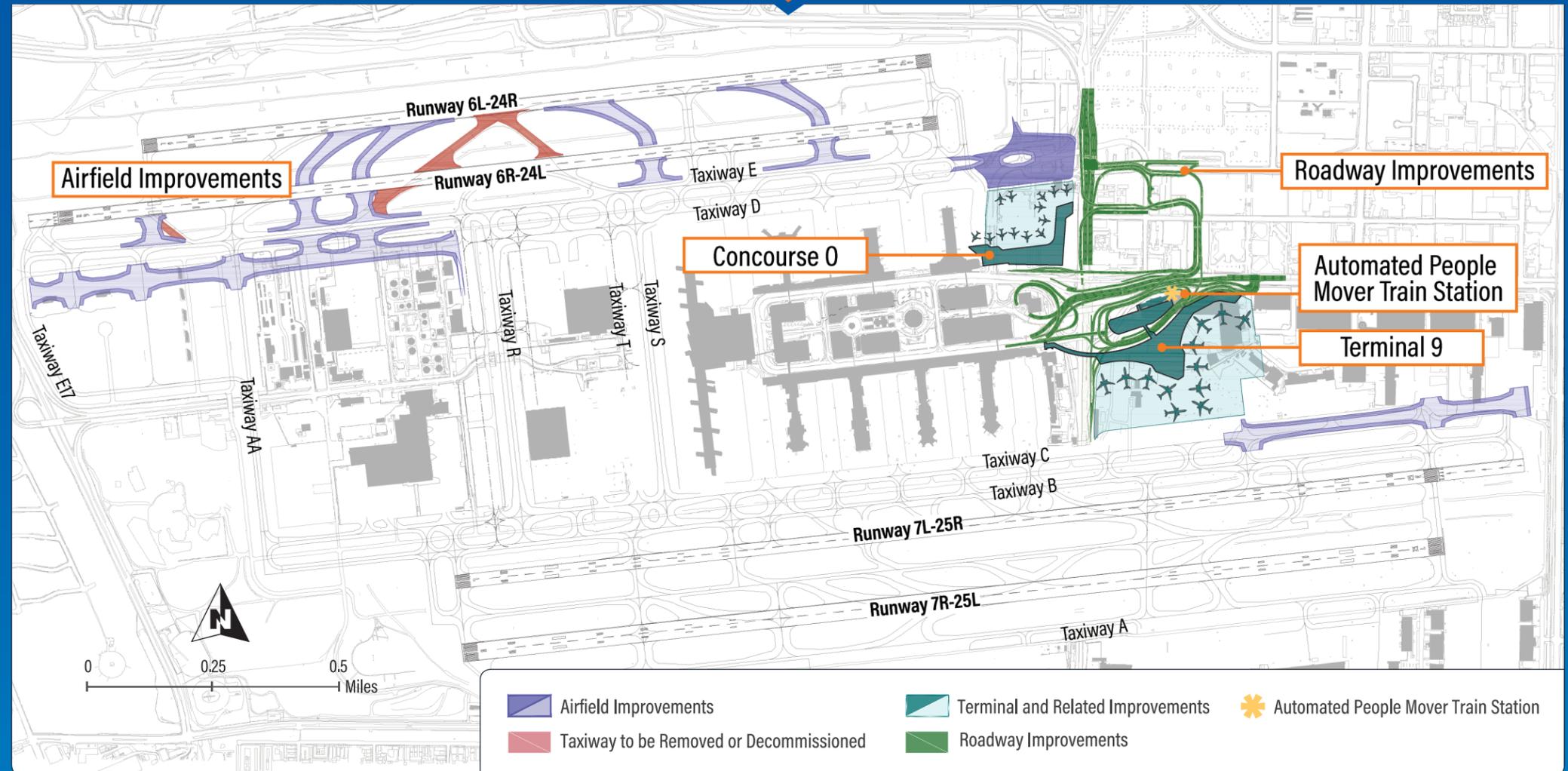
- Promotes local jobs during construction and operations
- Provides additional concessions (restaurants & shops)
- Increases business opportunities for local and small businesses

IMPROVES COMMUNITY EXPERIENCE



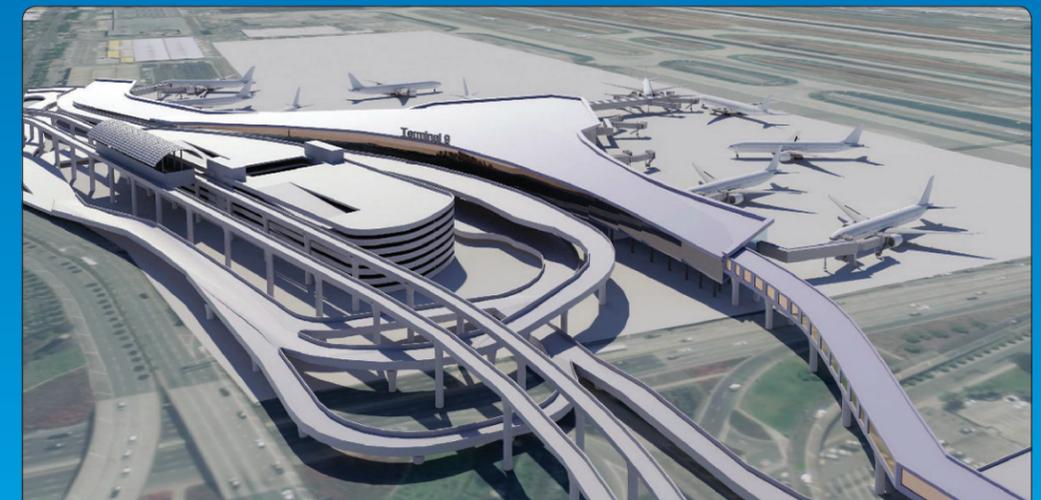
- Reduces traffic congestion on neighborhood streets
- Promotes sustainable practices—minimum LEED Silver Certification for new buildings
- Reduces wait times on tarmac; reduces aircraft idling, decreasing emissions
- Provides an additional connection to the Automated People Mover train which will link to regional mass transit

Proposed Project Improvements



CONCOURSE 0

Conceptual View



TERMINAL 9

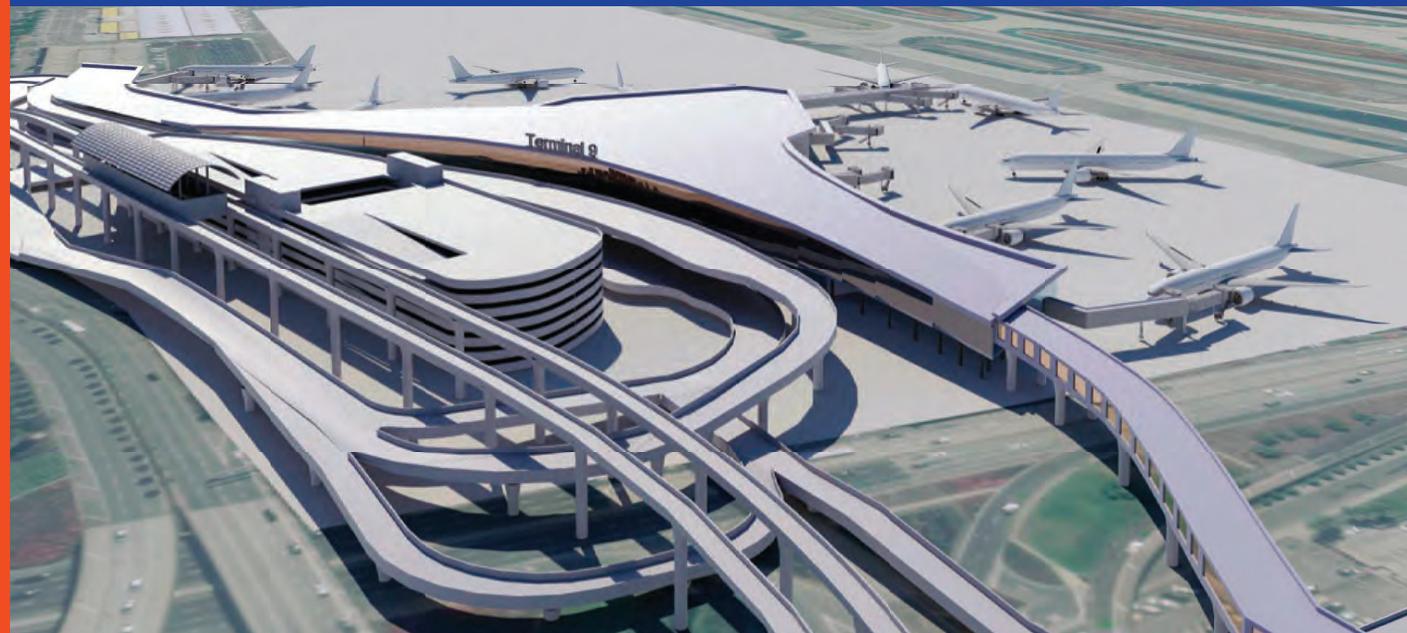
Conceptual View

WELCOME

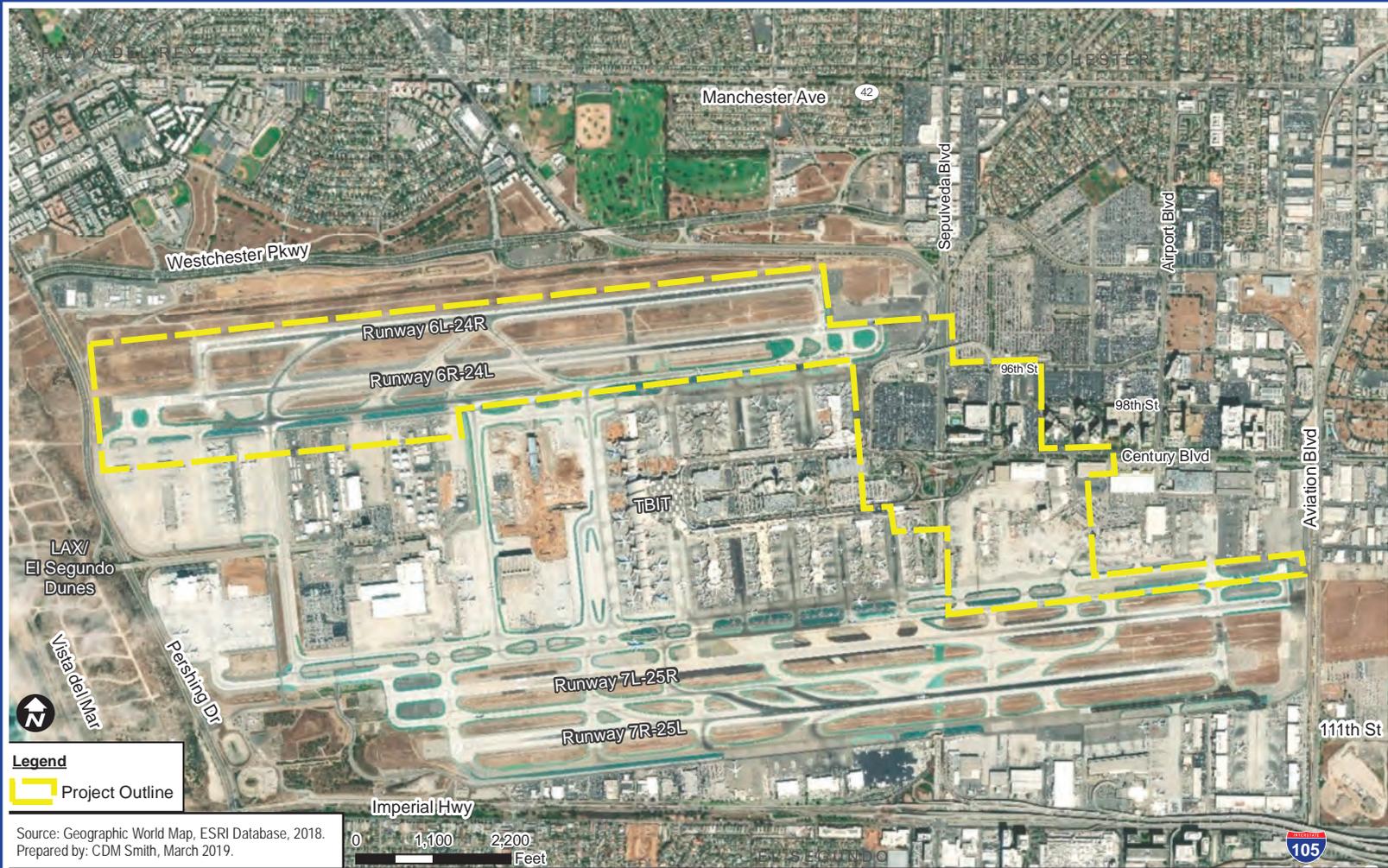


AIRFIELD & TERMINAL MODERNIZATION PROJECT

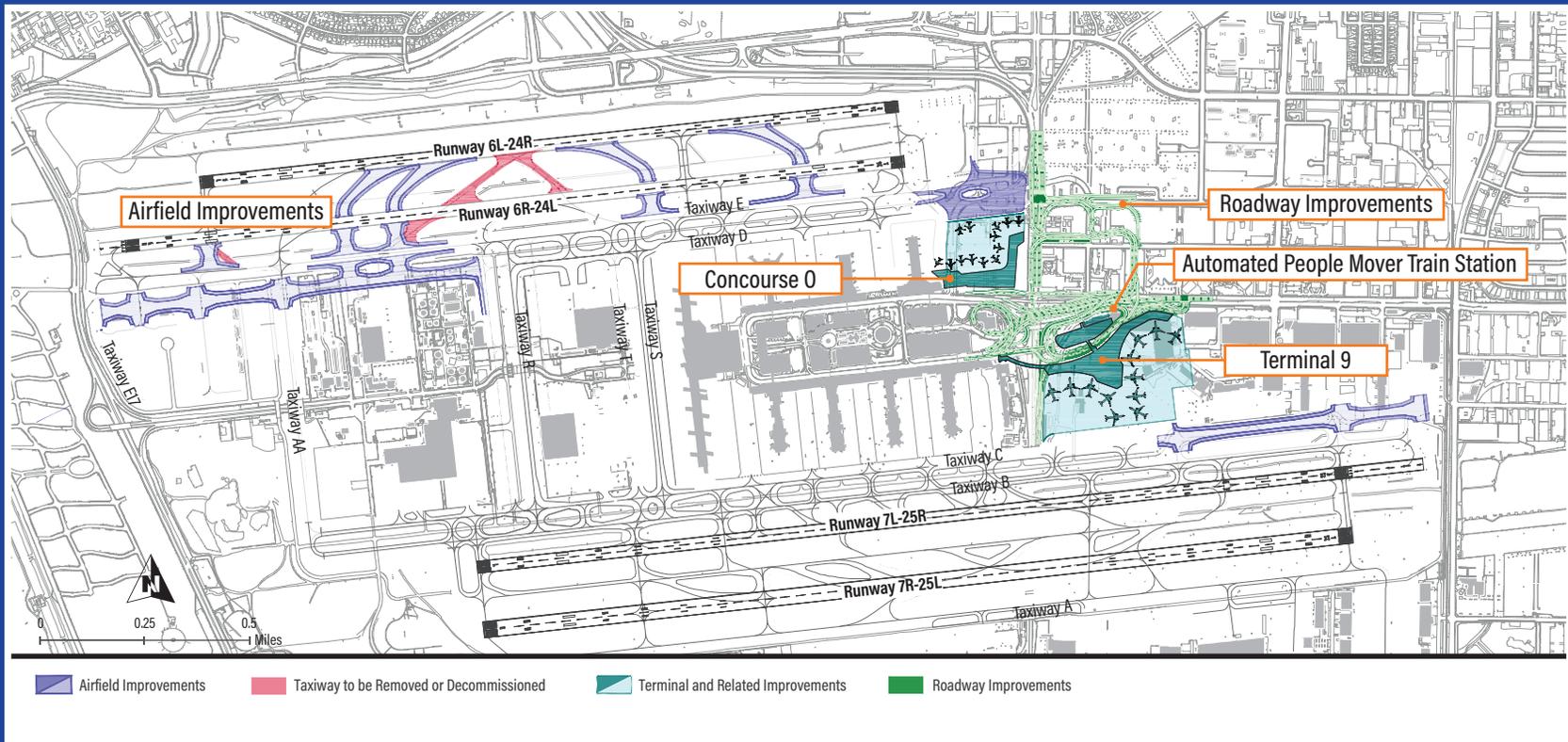
SCOPING MEETING



PROJECT LOCATION



PROJECT ELEMENTS



SCOPING MEETING PURPOSE

- ✈ Provide information about the Airfield and Terminal Modernization Project
- ✈ Provide information about the environmental process
- ✈ Present findings of Initial Study which identified environmental topics that will be further analyzed in the Environmental Impact Report (EIR)
- ✈ Collect community input on additional issues they would like to see analyzed in the EIR

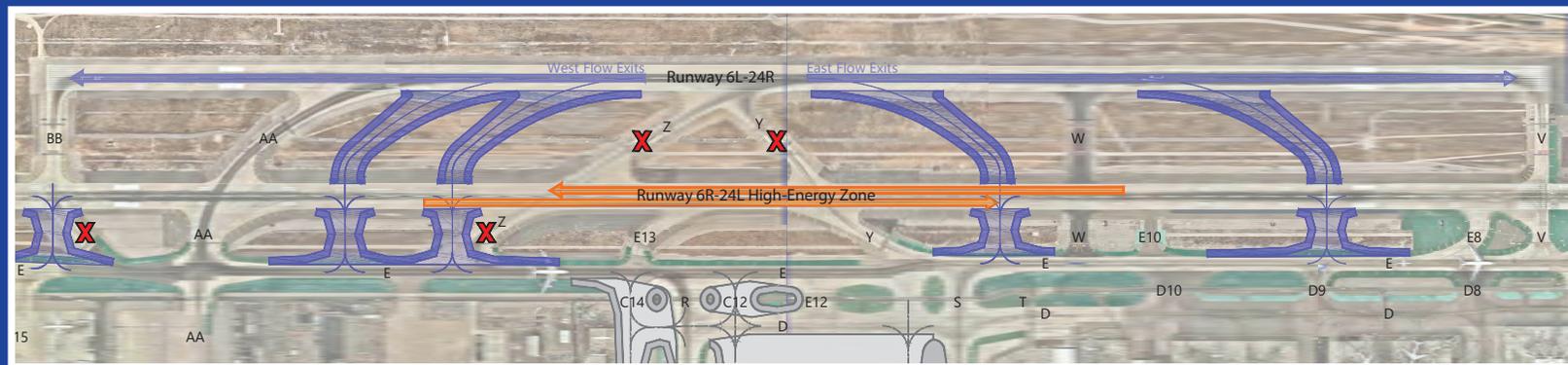


AIRFIELD IMPROVEMENTS



Reconfigures taxiways and runway exits to meet current FAA design standards

- ✈ Improves runway exit configurations to enhance pilot visibility
- ✈ Decommissions two runway exits and replaces with improved designs
- ✈ Extends Taxiway D westerly for operational efficiency and to meet FAA standards
- ✈ Improves Taxiways C & D for access to new terminal facilities
- ✈ Relocates vehicle service roads



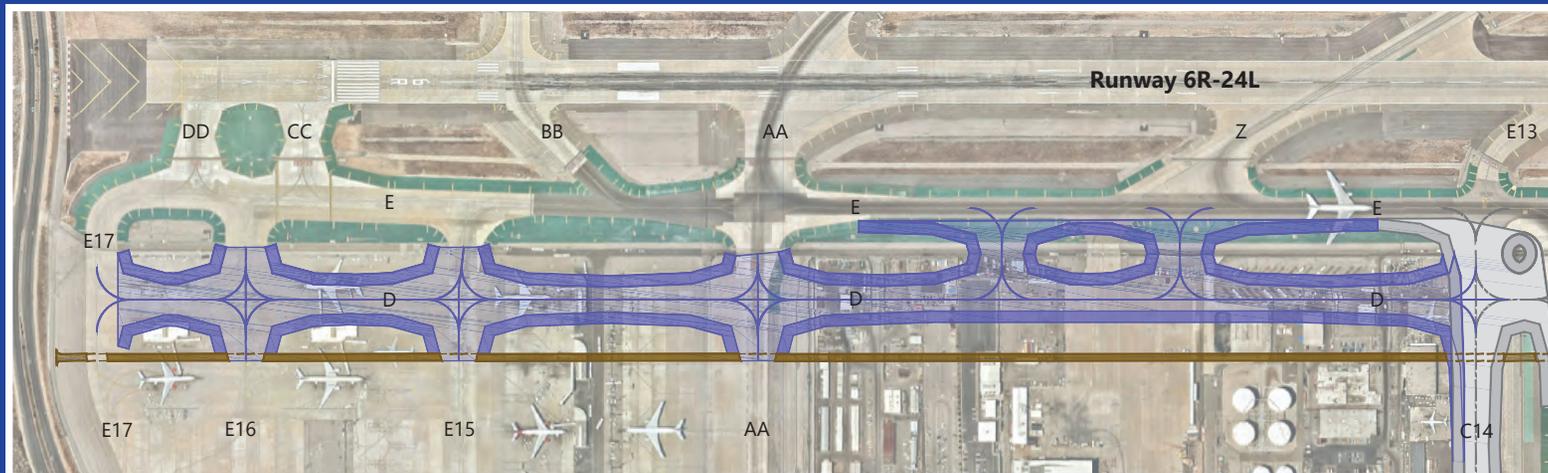
Exit Taxiway Improvements

AIRFIELD IMPROVEMENTS



The improvements:

- ✈ Reduce wait times on tarmac, which would lead to less aircraft idling and a decrease in emissions
- ✈ Increase operational efficiency which reduces delays and enhances safety



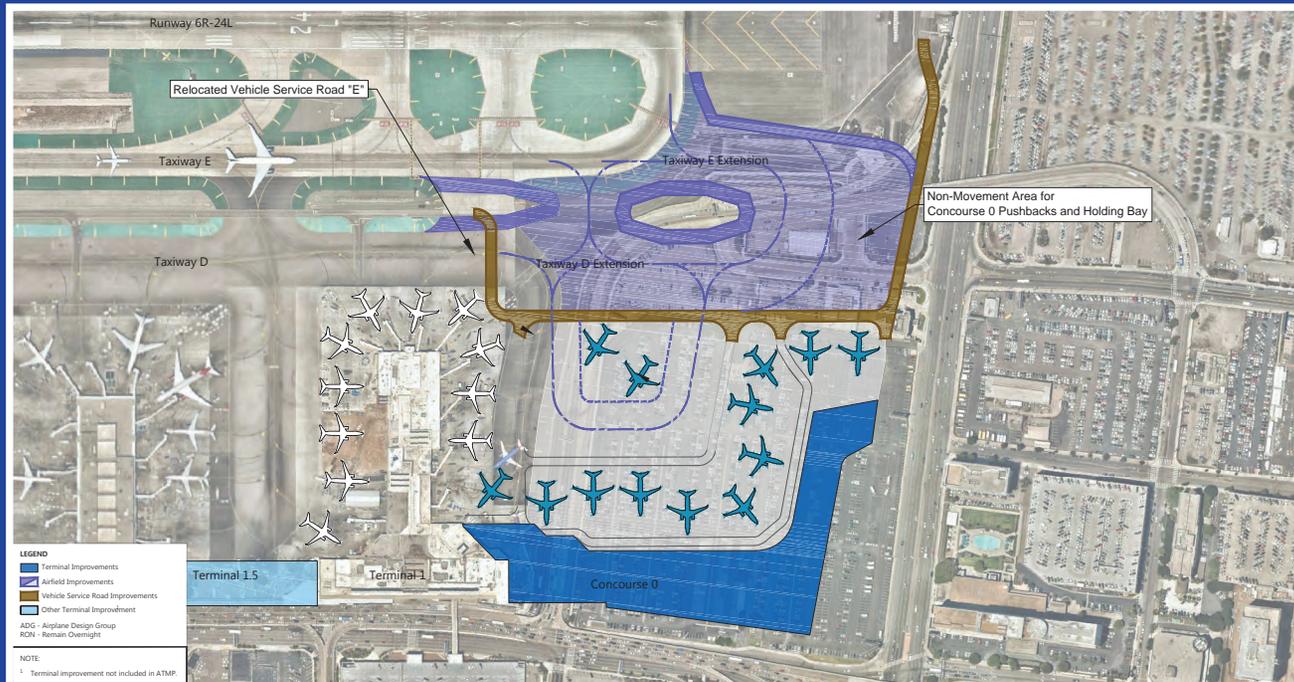
Taxiway Improvements – West End

TERMINAL IMPROVEMENTS



CONCOURSE 0 FEATURES

- ✈ Includes 11 Gates (9 new) for narrowbody planes
- ✈ Provides international processing capability
- ✈ Replaces west remote gates
- ✈ Maintains curbside and passenger processing at Terminal 1
- ✈ Provides up to 1.2 million square feet of facilities



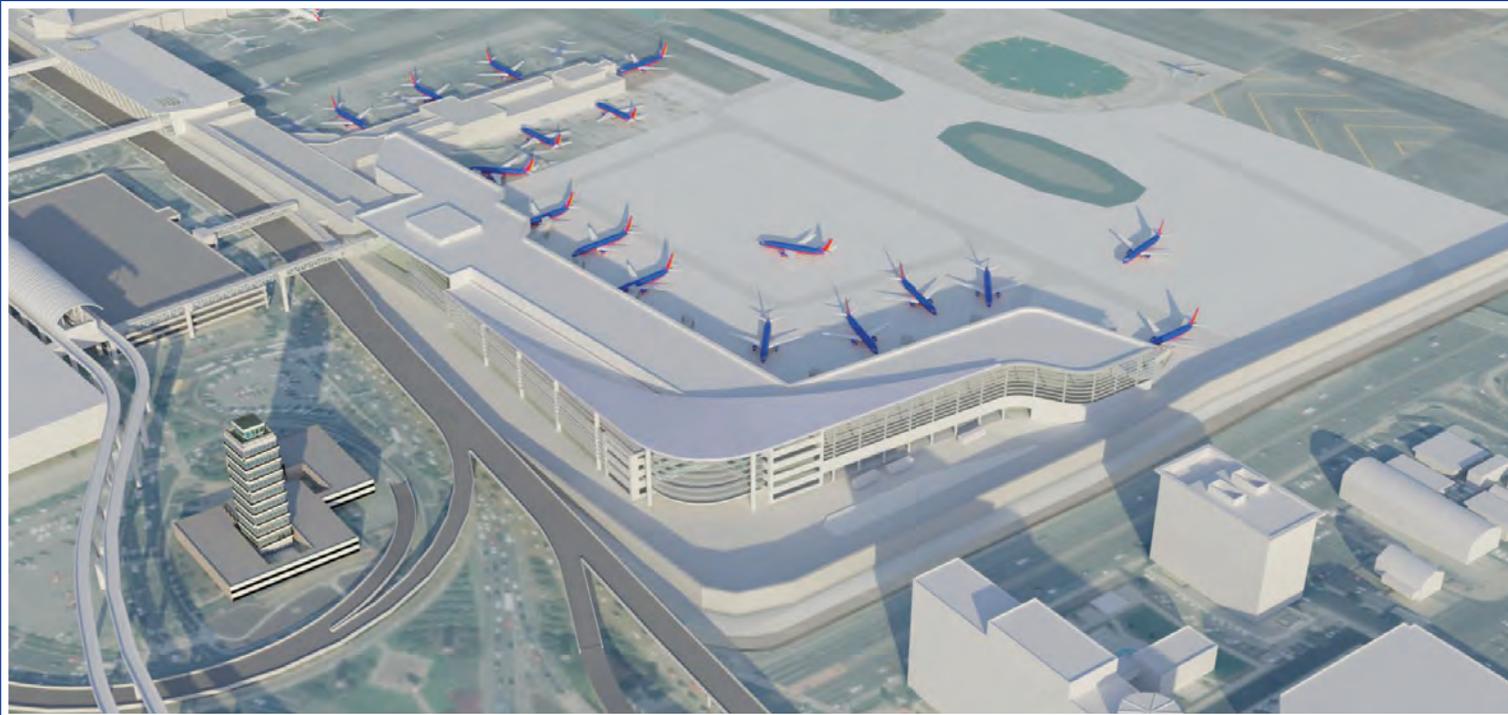
Concourse 0 Conceptual Site Plan

TERMINAL IMPROVEMENTS



CONCOURSE 0 BENEFITS

- ✈ Creates a pedestrian walkway to future Automated People Mover train station
- ✈ Provides additional concessions (restaurants and shops)
- ✈ Promotes sustainable practices, with a minimum LEED silver certification
- ✈ Creates jobs and business opportunities for local and small businesses during construction and operations



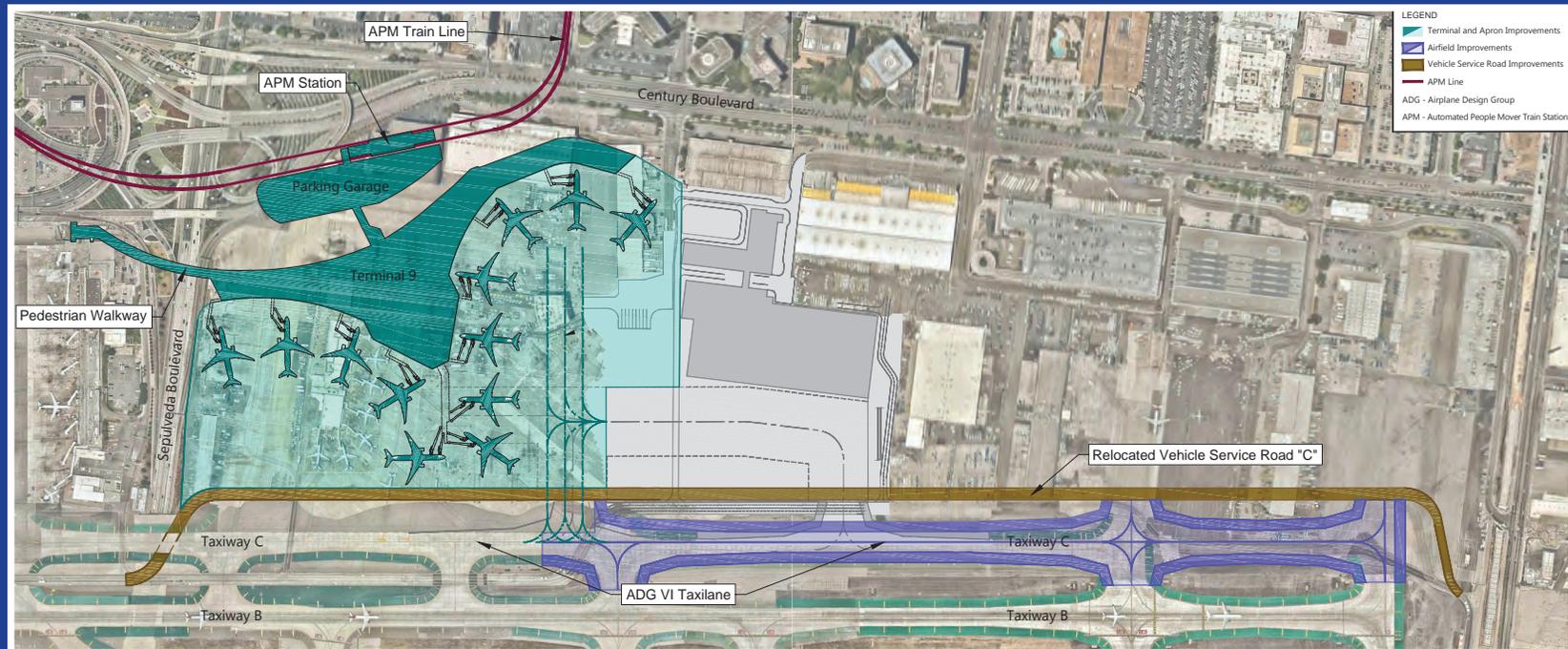
Concourse 0 Conceptual Landside View

TERMINAL IMPROVEMENTS



TERMINAL 9 FEATURES

- ✈ Includes 12 new gates for widebody planes
- ✈ Provides international processing capability
- ✈ Replaces west remote gates
- ✈ Includes landside access to/from the roadway system
- ✈ Provides up to 1.5 million square feet of facilities



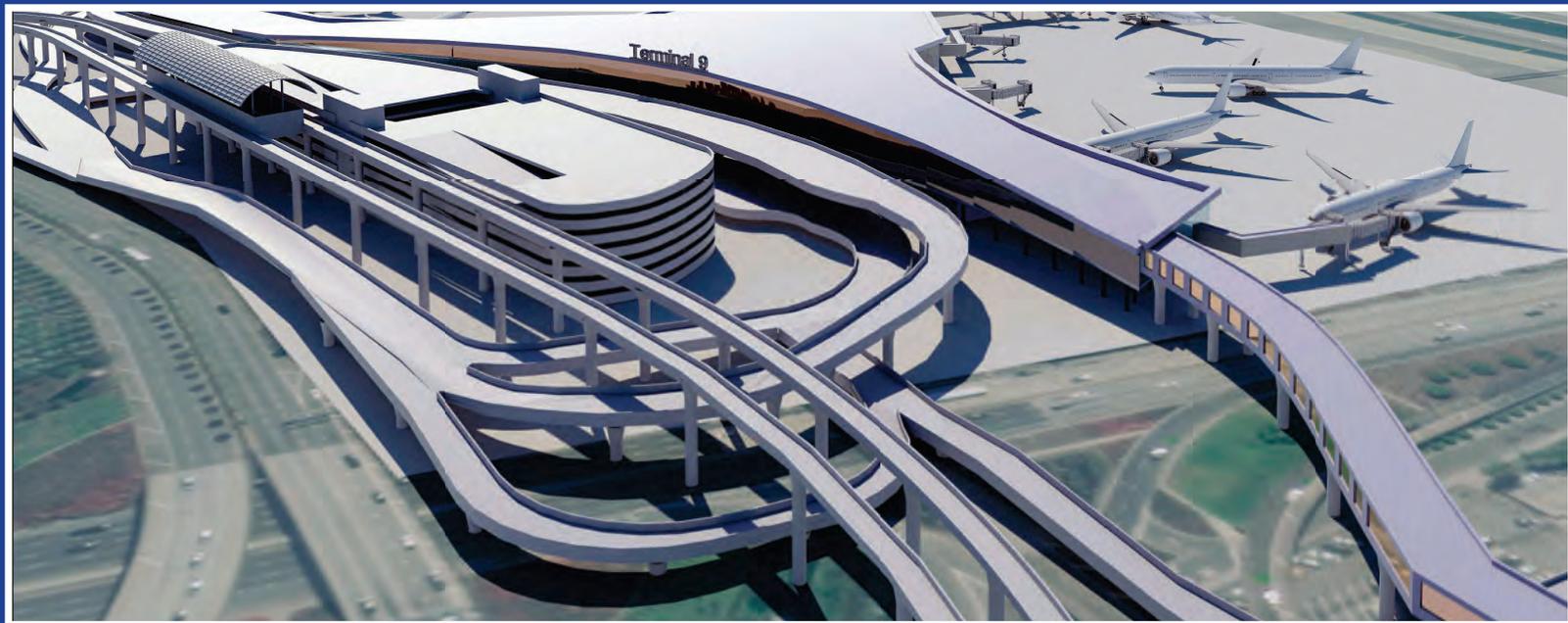
Terminal 9 Conceptual Site Plan

TERMINAL IMPROVEMENTS



TERMINAL 9 BENEFITS

- ✈ Creates pedestrian corridor to Terminal 8
- ✈ Promotes sustainable practices, with a minimum LEED silver certification
- ✈ Accesses new Automated People Mover train station
- ✈ Creates jobs and business opportunities for local and small businesses during construction and operations
- ✈ Provides additional concessions (restaurants and shops)

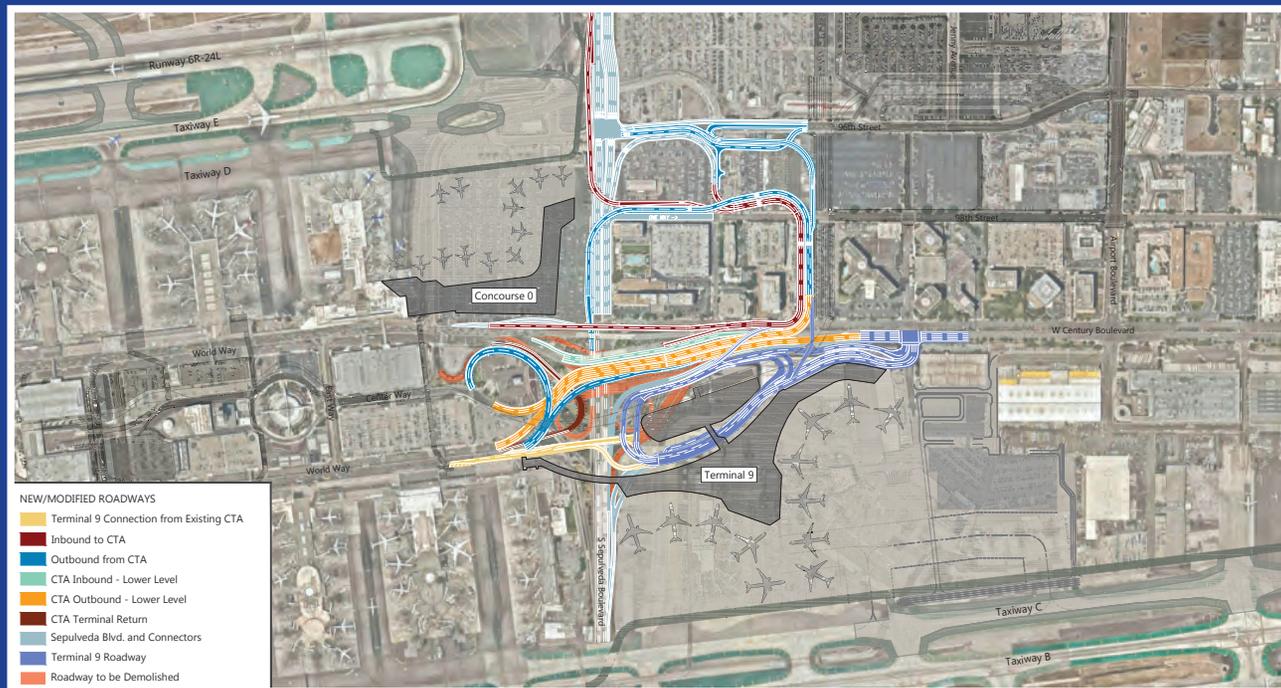


Terminal 9 Conceptual Landside View

LANDSIDE IMPROVEMENTS



- ✈ Provides dedicated access to the Central Terminal Area, including the new Terminal 9, with new elevated roadways
- ✈ Adds a new Automated People Mover train station at Terminal 9, which will link to regional mass transit
- ✈ Reduces congestion on nearby public roads and neighborhood streets
- ✈ Enhances access to the Intermodal Transportation Facility West



LANDSIDE IMPROVEMENTS



LOOKING SOUTH ALONG SEPULVEDA BOULEVARD



CTA = Central Terminal Area
ITF West = Intermodal Transportation Facility West (off image)

LANDSIDE IMPROVEMENTS



LOOKING NORTHWEST ACROSS TERMINAL 9 & SEPULVEDA BOULEVARD



CTA = Central Terminal Area

CEQA TIMELINE



WHAT IS THE CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)?

- ✈ Purpose is to inform decisionmakers, agencies, organizations and the public of the environmental effects of a project
- ✈ Applies to discretionary projects
- ✈ Performs a review of environmental resource areas to evaluate impacts and documents the results in an Environmental Impact Report
- ✈ Identifies potential effects on the environment
- ✈ Identifies ways to avoid or reduce significant effects through mitigation measures or alternatives

A separate National Environmental Policy Act (NEPA) process will be conducted starting after CEQA scoping is complete

INITIAL STUDY FINDINGS



No Impact/Less Than Significant (No Further Analysis)	Analysis Being Carried Forward in EIR
<ul style="list-style-type: none">■ Aesthetics■ Agricultural/Forestry Resources■ Archaeological Resources■ Biological Resources■ Geology and Soils■ Hydrology and Water Quality■ Mineral Resources■ Population and Housing■ Public Services■ Recreation■ Tribal Cultural Resources■ Wildfire	<ul style="list-style-type: none">■ Air Quality/Human Health Risk■ Energy■ Greenhouse Gas Emissions■ Hazards & Hazardous Materials■ Historical Resources■ Land Use and Planning■ Noise■ Transportation■ Utilities/Service Systems■ Other CEQA Considerations

PUBLIC COMMENTS ON THE NOP

Comments can be submitted on issues the public would like to see analyzed in the Environmental Impact Report (EIR):

- ✈ At this Scoping Meeting on comment cards or digitally
- ✈ Online at www.lawa.org/ATMP
- ✈ Mailed: Los Angeles World Airports
Attention: Evelyn Quintanilla
Chief Airport Planner, II
One World Way, P.O. Box 92216
Los Angeles, California 90009-2216



**Comments must be received by (not postmarked by)
5:00 pm, Monday, May 6, 2019**

Roadway Visual Simulation Videos

The following visual simulations were available for review during the scoping meetings:

- LAX Airfield and Terminal Modernization Project – Visual Simulation #1 of Proposed Roadway

<https://www.youtube.com/watch?v=dYMPAEgvE-A&t=11s+>

- LAX Airfield and Terminal Modernization Project – Visual Simulation #2 of Proposed Roadway

<https://www.youtube.com/watch?v=vrbMDUmVMl4>

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LAX Airfield and Terminal Modernization Project
CEQA Scoping Meeting #1
 Flight Path Museum & Learning Center
 6661 W Imperial Highway, Los Angeles, CA 90045
 Saturday, April 13, 2019, 10 AM – 12 PM



Sign-in Sheet

Name Nombre	Affiliation Afilación	Address Domicilio	Check here to receive email or post mail project notifications Marque aquí para recibir notificaciones de proyectos por correo electrónico o correo postal	Email Correo electrónico	Phone Number Número telefónico
Please print clearly Por favor, escriba claramente					
Joseph Stein	NONE				
Danna Love	ARSAC LAXAAC				
Denny Schneider	ARSAC				
Naomi Wanka	WPNC				
Carol Carlson					
Taylor Houser	HNIB				
Trana Payne	PGAV				
JOHN RYAN	—				



LAX Airfield and Terminal Modernization Project
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Sign-in Sheet

Name <i>Nombre</i>	Affiliation <i>Afiliación</i>	Address <i>Domicilio</i>	Check here to receive email or post mail project notifications <i>Marque aquí para recibir notificaciones de proyectos por correo electrónico o correo postal</i>	Email <i>Correo electrónico</i>	Phone Number <i>Número telefónico</i>
Please print clearly <i>Por favor, escriba claramente</i>					
Hamilton Cloud	Cong. Maxine Waters				
[Signature]	Roundtable				
Joseph Ross					
SANDRA BRAY	Home owner				
Corrie Zupo	UAL				
BRIAN DECloux	Spectrum				
MARIA BERNARDEZ	RICONDO				
Jonathan Golding	LAX Chamber				



Los Angeles
World Airports

LAX Airfield and Terminal Modernization Project
CEQA Scoping Meeting #1
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AIRFIELD & TERMINAL
 MODERNIZATION PROJECT

Sign-in Sheet

Name <i>Nombre</i>	Affiliation <i>Afiliación</i>	Address <i>Domicilio</i>	Check here to receive email or post mail project notifications <i>Marque aquí para recibir notificaciones de proyectos por correo electrónico o correo postal</i>	Email <i>Correo electrónico</i>	Phone Number <i>Número telefónico</i>
Please print clearly <i>Por favor, escriba claramente</i>					
VICTOR FEATHERS	FENTRESS ARCHITECTS				
Rochelle Lucas	KJLH Radio				
Kae Lamotte	LAX Chambers				
DAVE MASARO					
Tom Flinthoff	Kindel Loren				
Diane O'Mara	Nora Robinson				
KATE SPEAR	UNITE HERE LOCAL 11				



LAX Airfield and Terminal Modernization Project
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 MODERNIZATION PROJECT

Sign-in Sheet

Name <i>Nombre</i>	Affiliation <i>Afiliación</i>	Address <i>Domicilio</i>	Check here to receive email or post mail project notifications <i>Marque aquí para recibir notificaciones de proyectos por correo electrónico o correo postal</i>	Email <i>Correo electrónico</i>	Phone Number <i>Número telefónico</i>
Please print clearly <i>Por favor, escriba claramente</i>					
Ryan Farr					
LEN BONILLA					
JD HARTMAN					
Julian Allen					



LAX Airfield and Terminal Modernization Project
CEQA Scoping Meeting #1
Flight Path Museum & Learning Center
6661 W Imperial Highway, Los Angeles, CA 90045
Saturday, April 13, 2019, 10 AM – 12 PM

AIRFIELD & TERMINAL
MODERNIZATION PROJECT

Business Card Sign-In Sheet

 Corrie Zupo Southern California Air Specialist  A STAR ALLIANCE MEMBER 	VICTOR H. FEATHERS Business Development Director – Los Angeles 	Neighborhood Council Westchester/Playa Dave Mannix Board Member Residential District 6 



LAX Airfield and Terminal Modernization Project
CEQA Scoping Meeting #2
 Westchester Senior Center
 8740 Lincoln Blvd, Los Angeles CA 90045
 Wednesday, April 17, 2019, 5 PM – 8 PM



Sign-in Sheet

Name <i>Nombre</i>	Affiliation <i>Afiliación</i>	Address <i>Domicilio</i>	Phone Number <i>Número telefónico</i>	Email <i>Correo electrónico</i>	Check here to receive email or post mail project notifications <i>Marque aquí para recibir notificaciones de proyectos por correo electrónico o correo postal</i>
Please print clearly <i>Por favor, escriba claramente</i>					
Mike Bowen	AECOM Hunt				
Judd B...	TITAN AEC				
Erick Rudo	Limbach				
ANDREW MATSUMOTO	FSB				
Anita Berelheimer	WESTCHESTER RESIDENT				
ARIANA PADUA	TURNER				
ESTHER YOUNG	Resident				
CINDY HARRISON	NEIGHBOR				

Sign-in Sheet

NameNombre	AffiliationAfilación	AddressDomicilio	Phone NumberNúmero telefónico	EmailCorreo electrónico	Check here to receive email or post mail project notifications Marque aquí para recibir notificaciones de proyectos por correo electrónico o correo postal
Please print clearly Por favor, escriba claramente					
TED ROSE	NCLWP CHAMBER ROTARY SMALL YMCA BUS. OWNER				
ROBERT ACHERMAN	ARSAE				
Tommy Dawley					
Magno Sullano					
Ange Moalemi	Ricardo				
Seena Samini	JMBM / TPS				
BRUCE SCHELDEN	LAX VIP				
Corrie Zupo	UAL				

Sign-in Sheet

NameNombre	Affiliation Afilación	Address Domicilio	Phone Number Número telefónico	Email Correo electrónico	Check here to receive email or post mail project notifications Marque aquí para recibir notificaciones de proyectos por correo electrónico o correo postal
Please print clearly Por favor, escriba claramente					
Mania Bernandez	Ricondo				
Aucileia	Resident				
Weisdomit Monica	resident				
Montana Brickner	employee				
Adrian WEBB	RESIDENT				
John	Doe				
Jim B.					

Sign-in Sheet

NameNombre	Affiliation Afilación	Address Domicilio	Phone Number Número telefónico	Email Correo electrónico	Check here to receive email or post mail project notifications Marque aquí para recibir notificaciones de proyectos por correo electrónico o correo postal
Please print clearly Por favor, escriba claramente					
Phillip Iacono	LAWA	[Redacted]			
DIANE SHER					
Paula Geyer					
SEVEN W. WILSON John Warner	RESIDENT				
Dr. D. Warner	Lawyer				



LAX Airfield and Terminal Modernization Project
CEQA Scoping Meeting #2
 Westchester Senior Center
 8740 Lincoln Blvd, Los Angeles CA 90045
 Wednesday, April 17, 2019, 5 PM – 8 PM



Sign-in Sheet

Name Nombre	Affiliation Afilación	Address Domicilio	Phone Number Número telefónico	Email Correo electrónico	Check here to receive email or post mail project notifications Marque aquí para recibir notificaciones de proyectos por correo electrónico o correo postal
Please print clearly Por favor, escriba claramente					
Delia Chi	LAWA				
Carolyn Lane					
Grace Yao	LMU				
Christie McNeill	PDR				
Julia					
Glenda S					
Cindi Hench	NCWP				
Matt Mead					

Sign-in Sheet

NameNombre	Affiliation Afilación	Address Domicilio	Phone Number Número telefónico	Email Correo electrónico	Check here to receive email or post mail project notifications Marque aquí para recibir notificaciones de proyectos por correo electrónico o correo postal
Please print clearly Por favor, escriba claramente					
ESTER HOROMPOLY		[REDACTED]			
GRANT FRANCIS					
David Whitaker					
Al Galy					
Ed Futton					
CHAD LEE					
DIANA BAYNE					
Joe Guglielmo					



Los Angeles
World Airports

LA LAX Airfield and Terminal Modernization Project CEQA Scoping Meeting #2

Westchester Senior Center
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AIRFIELD & TERMINAL
MODERNIZATION PROJECT

Business Card Sign-In Sheet

RS&H ARCHITECTURE | ENGINEERING | CONSULTING

ROB GROTEFEND, GISP
Aviation Planning Consultant

[Redacted contact information]

LEVI MCKEE AIA LEED AP BD+C
ASSOCIATE PRINCIPAL

[Redacted contact information]



PGAL.COM



JOHN KRUCKENBERG
Plumbing Estimator

[Redacted contact information]

RS&H ARCHITECTURE | ENGINEERING | CONSULTING

BYRON CHAVEZ, PE
Aviation Engineer

[Redacted contact information]

UNITED



Brendan Baker
Director
Corporate Real Estate

[Redacted contact information]

A STAR ALLIANCE MEMBER



ERICK PULIDO
Design Development
Preconstruction Manager

[Redacted contact information]

Business Development Manager
Senior Associate
CPSM
Tonya Doooley



MARIO TRUJILLO
TECHNICAL SPECIALIST - CIVIL / BIM

[Redacted contact information]



Neighborhood Council
Westchester/Playa

Dave Mannix
Board Member
Residential District 6

[Redacted contact information]



Los Angeles
World Airports

LA LAX Airfield and Terminal Modernization Project CEQA Scoping Meeting #2

Westchester Senior Center
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AIRFIELD & TERMINAL
MODERNIZATION PROJECT

Business Card Sign-In Sheet

BRIAN R. PHILLIPS, PE, LEED® AP
VICE PRESIDENT, AVIATION

BURNS ENGINEERING, INC



PETER W. AARONS
VICE PRESIDENT, WESTERN REGION
AVIATION AND RAIL

BURNS ENGINEERING, INC.



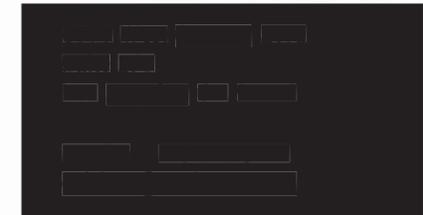
SWANSON  RINK

Marybeth S. Bunker, CPSM, CBD
Senior Business Development Manager



AvAirPros

Ed Fulton
Senior Managing Director





Los Angeles
World Airports

LA LAX Airfield and Terminal Modernization Project
CEQA Scoping Meeting #2

Westchester Senior Center
8740 Lincoln Blvd, Los Angeles CA 90045
Wednesday, April 17, 2019, 5 PM – 8 PM

AIRFIELD & TERMINAL
MODERNIZATION PROJECT

Business Card Sign-In Sheet

James W. Long, PE
Project Manager

HNTB Corporation



HNTB

The HNTB Companies

<p>James W. Long, PE Project Manager</p> <p>HNTB Corporation</p>  <p>HNTB</p> <p>The HNTB Companies</p>		

Appendix A.3 Written Comments Received

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Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

Notice of Preparation

April 4, 2019

To: Reviewing Agencies

Re: Los Angeles International Airport Airfield and Terminal Modernization Project
SCH# 2019049020

Attached for your review and comment is the Notice of Preparation (NOP) for the Los Angeles International Airport Airfield and Terminal Modernization Project draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

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

with a copy to the State Clearinghouse in the Office of Planning and Research at state.clearinghouse@opr.ca.gov. Please refer to the SCH number noted above in all correspondence concerning this project on our website: <https://ceqanet.opr.ca.gov/2019049020/2>.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Director, State Clearinghouse

cc: Lead Agency

Notice of Completion & Environmental Document Transmittal

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613
For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

SCH# 2019049020

Project Title: Los Angeles International Airport Airfield and Terminal Modernization Project

Lead Agency: City of Los Angeles, Los Angeles World Airports (LAWA)

Contact Person: Evelyn Quintanilla

Mailing Address: P.O. Box 92216

Phone: (800) 919-3766

City: Los Angeles

Zip: 90009-2216

County: Los Angeles

Project Location: County: Los Angeles

City/Nearest Community: Los Angeles/ Westchester

Cross Streets: nearest major intersection is Century Boulevard and Sepulveda Boulevard

Zip Code: 90045

Longitude/Latitude (degrees, minutes and seconds): 33 ° 56 ' 45 " N / 118 ° 23 ' 45 " W Total Acres: 384

Assessor's Parcel No.: 4129-028-900

Section: 6

Twp.: 2S & 3S

Range: 14W&15W Base:

Within 2 Miles: State Hwy #: 1 (Lincoln/Sepulveda)

Waterways: Pacific Ocean

Airports: LAX

Railways: LA Metro Green Line

Schools: Bright Star Academy

Document Type:

- CEQA: [X] NOP
[] Early Cons
[] Neg Dec
[] Mit Neg Dec

- [] Draft EIR
[] Supplement/Subsequent EIR
(Prior SCH No.)
Other:

- NEPA: [] NOI
[] EA
[] Draft EIS
[] FONSI

- Other: [] Joint Document
[] Final Document
[] Other:

Governor's Office of Planning & Research

Local Action Type:

- [] General Plan Update
[] General Plan Amendment
[] General Plan Element
[] Community Plan
[] Specific Plan
[] Master Plan
[] Planned Unit Development
[] Site Plan

- [] Rezone
[] Prezone
[] Land Division (Subdivision, etc.)
[] Annexion
[X] Redevelopment
[] Coastal Permit
[] Other:

APR 04 2019

STATE CLEARINGHOUSE

Development Type:

- [] Residential: Units _____ Acres _____
[] Office: Sq.ft. _____ Acres _____ Employees _____
[] Commercial: Sq.ft. _____ Acres _____ Employees _____
[] Industrial: Sq.ft. _____ Acres _____ Employees _____
[] Educational: _____
[] Recreational: _____
[] Water Facilities: Type _____ MGD _____

- [X] Transportation: Type Airport
[] Mining: Mineral _____
[] Power: Type _____ MW
[] Waste Treatment: Type _____ MGD
[] Hazardous Waste: Type _____
[] Other: , Energy

Project Issues Discussed in Document:

- [] Aesthetic/Visual
[X] Air Quality
[X] Archeological/Historical
[] Biological Resources
[] Coastal Zone
[] Drainage/Absorption
[] Economic/Jobs
[] Fiscal
[] Flood Plain/Flooding
[] Forest Land/Fire Hazard
[] Geologic/Seismic
[] Minerals
[X] Noise
[] Population/Housing Balance
[] Public Services/Facilities
[] Recreation/Parks
[] Schools/Universities
[] Septic Systems
[] Sewer Capacity
[] Soil Erosion/Compaction/Grading
[] Solid Waste
[X] Toxic/Hazardous
[X] Traffic/Circulation
[] Vegetation
[] Water Quality
[X] Water Supply/Groundwater
[] Wetland/Riparian
[] Growth Inducement
[X] Land Use
[X] Cumulative Effects
[X] Other: Greenhouse Gases, Energy

Present Land Use/Zoning/General Plan Designation:

LAX Specific Plan: LAX Zone - Airport Airside Subarea, LA Zone - Airport Landside Subarea; Westchester-Playa del Rey Community Plan; G2 Zone

Project Description: (please use a separate page if necessary)

See separate page

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

NOP Distribution List

County: Los Angeles *ok*

SCH# 2019049020

Regional Water Quality Control Board (RWQCB)

- RWQCB 1**
Cathleen Hudson
North Coast Region (1)
- RWQCB 2**
Environmental Document
Coordinator
San Francisco Bay Region (2)
- RWQCB 3**
Central Coast Region (3)
- RWQCB 4**
Teresa Rodgers
Los Angeles Region (4)
- RWQCB 5S**
Central Valley Region (5)
- RWQCB 5F**
Central Valley Region (5)
Fresno Branch Office
- RWQCB 5R**
Central Valley Region (5)
Redding Branch Office
- RWQCB 6**
Lahontan Region (6)
- RWQCB 6V**
Lahontan Region (6)
Victorville Branch Office
- RWQCB 7**
Colorado River Basin Region (7)
- RWQCB 8**
Santa Ana Region (8)
- RWQCB 9**
San Diego Region (9)
- Other** _____

- _____

- _____
Conservancy

Resources Agency

Resources Agency
Nadell Gayou

Dept. of Boating & Waterways
Denise Peterson

California Coastal Commission
Allyson Hitt

Colorado River Board
Elsa Contreras

Dept. of Conservation
Crina Chan

Cal Fire
Dan Foster

Central Valley Flood Protection Board
James Herola

Office of Historic Preservation
Ron Parsons

Dept of Parks & Recreation
Environmental Stewardship Section

S.F. Bay Conservation & Dev't. Comm.
Steve Goldbeck

Dept. of Water Resources
Resources Agency
Nadell Gayou

Fish and Game

Dept. of Fish & Wildlife
Scott Flint
Environmental Services Division

Fish & Wildlife Region 1
Curt Babcock

Fish & Wildlife Region 1E
Laurie Harnsberger

Fish & Wildlife Region 2
Jeff Drongesen

Fish & Wildlife Region 3
Craig Weightman

Fish & Wildlife Region 4
Julie Vance

Fish & Wildlife Region 5
Leslie Newton-Reed
Habitat Conservation Program

Fish & Wildlife Region 6
Tiffany Ellis
Habitat Conservation Program

Fish & Wildlife Region 6 I/M
Heidi Calvert
Inyo/Mono, Habitat Conservation Program

Dept. of Fish & Wildlife M
William Paznokas
Marine Region

Other Departments

California Department of Education
Lesley Taylor

OES (Office of Emergency Services)
Monique Wilber

Food & Agriculture
Sandra Schubert
Dept. of Food and Agriculture

Dept. of General Services
Calhy Buck
Environmental Services Section

Housing & Comm. Dev.
CEQA Coordinator
Housing Policy Division

Independent Commissions/Boards

Delta Protection Commission
Erik Vink

Delta Stewardship Council
Anthony Navasero

California Energy Commission
Eric Knight

Native American Heritage Comm.
Debbie Treadway

Public Utilities Commission
Supervisor

Santa Monica Bay Restoration
Guangyu Wang

State Lands Commission
Jennifer Deleong

Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Cal State Transportation Agency CalSTA

Caltrans - Division of Aeronautics
Philip Crimmins

Caltrans - Planning
HQ LD-IGR
Christian Bushong

California Highway Patrol
Suzann Ikeuchi
Office of Special Projects

Dept. of Transportation

Caltrans, District 1
Rex Jackman

Caltrans, District 2
Marcelino Gonzalez

Caltrans, District 3
Susan Zanchi

Caltrans, District 4
Patricia Maurice

Caltrans, District 5
Larry Newland

Caltrans, District 6
Michael Navarro

Caltrans, District 7
Dianna Watson

Caltrans, District 8
Mark Roberts

Caltrans, District 9
Gayle Rosander

Caltrans, District 10
Tom Dumas

Caltrans, District 11
Jacob Armstrong

Caltrans, District 12
Maureen El Harake

Cal EPA

Air Resources Board

Airport & Freight
Jack Wursten

Transportation Projects
Nesamani Kalandiyur

Industrial/Energy Projects
Mike Tollstrup

California Department of Resources, Recycling & Recovery
Kevin Taylor/Jeff Esquivel

State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance

State Water Resources Control Board
Cindy Forbes - Asst Deputy
Division of Drinking Water

State Water Resources Control Board
Div. Drinking Water # _____

State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

State Water Resources Control Board
Phil Crader
Division of Water Rights

Dept. of Toxic Substances Control Reg. # _____
CEQA Tracking Center

Department of Pesticide Regulation
CEQA Coordinator

From: [Smartsheet Notifications](#)
To: [MARTINEZ-SIDHOM, BRENDA](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Thursday, April 04, 2019 4:47:35 PM



Log In

[Our LAX Comment Form \(Prod\)](#)

Changes since 4/4/19 4:45 PM

1 row added

1 row added or updated (shown in **yellow**)

Row 6

Row ID	6
Full Name	Daniel Alexander
Company Name	Resident
Email Address	
Comments	please keep pedestrian access from sepulveda and Century. What will LAWA do to preserve this?
Created	04/04/19 4:45 PM
Project	ATMP

Changes made by web-form@smartsheet.com

You are receiving this email because you are subscribed to a notification "Notification" (ID# 2565793968875396) on sheet [Our LAX Comment Form \(Prod\)](#)
Your notifications include changes made by you. [Exclude your changes from all notifications](#)
Don't want to receive this notification? [Unsubscribe](#)

Please do not reply to this mail. For support or questions, please contact us at www.smartsheet.com/gethelp
© 2019 Smartsheet Inc. | [Contact](#) | [Privacy Policy](#) | [User Agreement](#) [Report Abuse/Spam](#)

From: [Smartsheet Notifications](#)
To: [MARTINEZ-SIDHOM, BRENDA](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Saturday, April 06, 2019 5:50:36 AM



Log In

[Our LAX Comment Form \(Prod\)](#)

Changes since 4/6/19 5:48 AM

1 row added

1 row added or updated (shown in **yellow**)

Row 7

Row ID	7
Full Name	Cary Adams
Company Name	
Email Address	cavalleyboy@earthlink.net
Comments	As child I clearly recall the construction of the LAX west of Sepulveda Blvd. with the Theme Building a spectacular centerpiece. Unfortunately, it is now being lost between the various parking garages, roadways and terminals that are now 2 stories high instead of one level as originally constructed. Realizing it likely has historic status, is it possible that structure could be entirely raised to a higher level that would enhance visibility? Though any changes to an historic building might be difficult, engineering should be a big problem.
Created	04/06/19 5:48 AM
Project	General Comment

Changes made by web-form@smartsheet.com

You are receiving this email because you are subscribed to a notification "Notification" (ID# 2565793968875396) on sheet [Our LAX Comment Form \(Prod\)](#)
Your notifications include changes made by you. [Exclude your changes from all notifications](#)
Don't want to receive this notification? [Unsubscribe](#)

From: [Smartsheet Notifications](#)
To: [MARTINEZ-SIDHOM, BRENDA](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Friday, April 12, 2019 4:16:03 PM



Log In

[Our LAX Comment Form \(Prod\)](#)

Changes since 4/12/19 4:13 PM

1 row added , 1 row changed
1 attachment added

1 row added or updated (shown in **yellow**)

Row 9

Row ID	9
Full Name	Alec Frank
Company Name	
Email Address	RandomReceipts@gmail.com
Comments	Question: If the ATMP is completed as currently designed, how would traffic southbound on Sepulveda Boulevard access the upper and lower levels of the CTA? It appears that the current route via westbound Vicksburg Avenue would be eliminated. See attached image. Thank you.
Created	04/12/19 4:13 PM
Project	ATMP

Changes made by web-form@smartsheet.com

1 attachment added

[ATMP Aerial 1.jpg \(371k\)](#) added by web-form@smartsheet.com on Row 9:
 Alec Frank

You are receiving this email because you are subscribed to a notification "Notification" (ID# 2565793968875396) on sheet [Our LAX Comment Form \(Prod\)](#)
Your notifications include changes made by you. [Exclude your changes from all notifications](#)
Don't want to receive this notification? [Unsubscribe](#)

From: [Smartsheet Notifications](#)
To: [MARTINEZ-SIDHOM, BRENDA](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Saturday, April 13, 2019 9:56:40 AM

  [Log In](#)

 [Our LAX Comment Form \(Prod\)](#)
Changes since 4/13/19 9:54 AM

2 rows added

2 rows added or updated (shown in **yellow**)

		Row ID	Full Name	Company Name	Email Address	Comments	Created	Project
		11	aa	aa	aa@aa.com	asdfs	04/13/19 9:54 AM	ATMP
		12	a	aa	aa@aa.com	aa	04/13/19 9:54 AM	ATMP

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1 row added

1 row added or updated (shown in **yellow**)

Row 10

Row ID	10
Full Name	john
Company Name	sas
Email Address	aa@aa.com
Comments	sdf
Created	04/13/19 9:47 AM
Project	ATMP

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Changes since 4/13/19 10:23 AM

2 rows added

2 rows added or updated (shown in yellow)

		Row ID	Full Name	Company Name	Email Address	Comments	Created	Project
		13	Rochelle Lucas	Landmark Builders, LLC	rochellelucas@sbcglobal.net	I am a minority owned business interested in opportunities with LAWA. Parking is only one of my interest areas.	04/13/19 10:23 AM	General Comment
		14	Naomi Waka		naomiwaka@sbcglobal.net		04/13/19 10:23 AM	ATMP

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From: [Smartsheet Notifications](#)
To: [CRUZ, OHASSY C.](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Monday, April 15, 2019 4:53:41 PM



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Changes since 4/15/19 3:56 PM

1 row added

1 row added or updated (shown in **yellow**)

Row 15

Row ID	15
Full Name	Erica Berardi
Company Name	NA
Email Address	ericaberardi@yahoo.com
Comments	Can you please fix the link to the initial study for lax expansion or email me please at ericaberardi@yahoo.com. I am an El Segundo resident. Thank you!!!
Created	04/15/19 3:56 PM
Project	General Comment

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NATIVE AMERICAN HERITAGE COMMISSION
Cultural and Environmental Department
1550 Harbor Blvd., Suite 100
West Sacramento, CA 95691 Phone (916) 373-3710
Email: nahc@nahc.ca.gov
Website: <http://www.nahc.ca.gov>
Twitter: @CA_NAHC



April 16, 2019

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

RE: SCH# 2019049020 Los Angeles International Airport Airfield and Terminal Modernization Project, Los Angeles County

Dear Ms. Quintanilla:

The Native American Heritage Commission (NAHC) has received the Notice of Preparation (NOP), Draft Environmental Impact Report (DEIR) or Early Consultation for the project referenced above. The California Environmental Quality Act (CEQA) (Pub. Resources Code §21000 et seq.), specifically Public Resources Code §21084.1, states that a project that may cause a substantial adverse change in the significance of a historical resource, is a project that may have a significant effect on the environment. (Pub. Resources Code § 21084.1; Cal. Code Regs., tit.14, §15064.5 (b) (CEQA Guidelines §15064.5 (b)). If there is substantial evidence, in light of the whole record before a lead agency, that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) shall be prepared. (Pub. Resources Code §21080 (d); Cal. Code Regs., tit. 14, § 5064 subd.(a)(1) (CEQA Guidelines §15064 (a)(1)). In order to determine whether a project will cause a substantial adverse change in the significance of a historical resource, a lead agency will need to determine whether there are historical resources within the area of potential effect (APE).

CEQA was amended significantly in 2014. Assembly Bill 52 (Gatto, Chapter 532, Statutes of 2014) (AB 52) amended CEQA to create a separate category of cultural resources, "tribal cultural resources" (Pub. Resources Code §21074) and provides that a project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment. (Pub. Resources Code §21084.2). Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource. (Pub. Resources Code §21084.3 (a)). **AB 52 applies to any project for which a notice of preparation, a notice of negative declaration, or a mitigated negative declaration is filed on or after July 1, 2015.** If your project involves the adoption of or amendment to a general plan or a specific plan, or the designation or proposed designation of open space, on or after March 1, 2005, it may also be subject to Senate Bill 18 (Burton, Chapter 905, Statutes of 2004) (SB 18). **Both SB 18 and AB 52 have tribal consultation requirements.** If your project is also subject to the federal National Environmental Policy Act (42 U.S.C. § 4321 et seq.) (NEPA), the tribal consultation requirements of Section 106 of the National Historic Preservation Act of 1966 (154 U.S.C. 300101, 36 C.F.R. §800 et seq.) may also apply.

The NAHC recommends consultation with California Native American tribes that are traditionally and culturally affiliated with the geographic area of your proposed project as early as possible in order to avoid inadvertent discoveries of Native American human remains and best protect tribal cultural resources. Below is a brief summary of portions of AB 52 and SB 18 as well as the NAHC's recommendations for conducting cultural resources assessments.

Consult your legal counsel about compliance with AB 52 and SB 18 as well as compliance with any other applicable laws.

AB 52

AB 52 has added to CEQA the additional requirements listed below, along with many other requirements:

1. Fourteen Day Period to Provide Notice of Completion of an Application/Decision to Undertake a Project: Within fourteen (14) days of determining that an application for a project is complete or of a decision by a public agency to undertake a project, a lead agency shall provide formal notification to a designated contact of, or tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, to be accomplished by at least one written notice that includes:
 - a. A brief description of the project.
 - b. The lead agency contact information.
 - c. Notification that the California Native American tribe has 30 days to request consultation. (Pub. Resources Code §21080.3.1 (d)).
 - d. A "California Native American tribe" is defined as a Native American tribe located in California that is on the contact list maintained by the NAHC for the purposes of Chapter 905 of Statutes of 2004 (SB 18). (Pub. Resources Code §21073).
2. Begin Consultation Within 30 Days of Receiving a Tribe's Request for Consultation and Before Releasing a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report: A lead agency shall begin the consultation process within 30 days of receiving a request for consultation from a California Native American tribe that is traditionally and culturally affiliated with the geographic area of the proposed project. (Pub. Resources Code §21080.3.1, subds. (d) and (e)) and prior to the release of a negative declaration, mitigated negative declaration or Environmental Impact Report. (Pub. Resources Code §21080.3.1(b)).
 - a. For purposes of AB 52, "consultation shall have the same meaning as provided in Gov. Code §65352.4 (SB 18). (Pub. Resources Code §21080.3.1 (b)).
3. Mandatory Topics of Consultation If Requested by a Tribe: The following topics of consultation, if a tribe requests to discuss them, are mandatory topics of consultation:
 - a. Alternatives to the project.
 - b. Recommended mitigation measures.
 - c. Significant effects. (Pub. Resources Code §21080.3.2 (a)).
4. Discretionary Topics of Consultation: The following topics are discretionary topics of consultation:
 - a. Type of environmental review necessary.
 - b. Significance of the tribal cultural resources.
 - c. Significance of the project's impacts on tribal cultural resources.
 - d. If necessary, project alternatives or appropriate measures for preservation or mitigation that the tribe may recommend to the lead agency. (Pub. Resources Code §21080.3.2 (a)).
5. Confidentiality of Information Submitted by a Tribe During the Environmental Review Process: With some exceptions, any information, including but not limited to, the location, description, and use of tribal cultural resources submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the lead agency or any other public agency to the public, consistent with Government Code §6254 (r) and §6254.10. Any information submitted by a California Native American tribe during the consultation or environmental review process shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public. (Pub. Resources Code §21082.3 (c)(1)).
6. Discussion of Impacts to Tribal Cultural Resources in the Environmental Document: If a project may have a significant impact on a tribal cultural resource, the lead agency's environmental document shall discuss both of the following:
 - a. Whether the proposed project has a significant impact on an identified tribal cultural resource.
 - b. Whether feasible alternatives or mitigation measures, including those measures that may be agreed to pursuant to Public Resources Code §21082.3, subdivision (a), avoid or substantially lessen the impact on the identified tribal cultural resource. (Pub. Resources Code §21082.3 (b)).

7. Conclusion of Consultation: Consultation with a tribe shall be considered concluded when either of the following occurs:
 - a. The parties agree to measures to mitigate or avoid a significant effect, if a significant effect exists, on a tribal cultural resource; or
 - b. A party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached. (Pub. Resources Code §21080.3.2 (b)).

8. Recommending Mitigation Measures Agreed Upon in Consultation in the Environmental Document: Any mitigation measures agreed upon in the consultation conducted pursuant to Public Resources Code §21080.3.2 shall be recommended for inclusion in the environmental document and in an adopted mitigation monitoring and reporting program, if determined to avoid or lessen the impact pursuant to Public Resources Code §21082.3, subdivision (b), paragraph 2, and shall be fully enforceable. (Pub. Resources Code §21082.3 (a)).

9. Required Consideration of Feasible Mitigation: If mitigation measures recommended by the staff of the lead agency as a result of the consultation process are not included in the environmental document or if there are no agreed upon mitigation measures at the conclusion of consultation, or if consultation does not occur, and if substantial evidence demonstrates that a project will cause a significant effect to a tribal cultural resource, the lead agency shall consider feasible mitigation pursuant to Public Resources Code §21084.3 (b). (Pub. Resources Code §21082.3 (e)).

10. Examples of Mitigation Measures That, If Feasible, May Be Considered to Avoid or Minimize Significant Adverse Impacts to Tribal Cultural Resources:
 - a. Avoidance and preservation of the resources in place, including, but not limited to:
 - i. Planning and construction to avoid the resources and protect the cultural and natural context.
 - ii. Planning greenspace, parks, or other open space, to incorporate the resources with culturally appropriate protection and management criteria.
 - b. Treating the resource with culturally appropriate dignity, taking into account the tribal cultural values and meaning of the resource, including, but not limited to, the following:
 - i. Protecting the cultural character and integrity of the resource.
 - ii. Protecting the traditional use of the resource.
 - iii. Protecting the confidentiality of the resource.
 - c. Permanent conservation easements or other interests in real property, with culturally appropriate management criteria for the purposes of preserving or utilizing the resources or places.
 - d. Protecting the resource. (Pub. Resource Code §21084.3 (b)).
 - e. Please note that a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC to protect a California prehistoric, archaeological, cultural, spiritual, or ceremonial place may acquire and hold conservation easements if the conservation easement is voluntarily conveyed. (Civ. Code §815.3 (c)).
 - f. Please note that it is the policy of the state that Native American remains and associated grave artifacts shall be repatriated. (Pub. Resources Code §5097.991).

11. Prerequisites for Certifying an Environmental Impact Report or Adopting a Mitigated Negative Declaration or Negative Declaration with a Significant Impact on an Identified Tribal Cultural Resource: An Environmental Impact Report may not be certified, nor may a mitigated negative declaration or a negative declaration be adopted unless one of the following occurs:
 - a. The consultation process between the tribes and the lead agency has occurred as provided in Public Resources Code §21080.3.1 and §21080.3.2 and concluded pursuant to Public Resources Code §21080.3.2.
 - b. The tribe that requested consultation failed to provide comments to the lead agency or otherwise failed to engage in the consultation process.
 - c. The lead agency provided notice of the project to the tribe in compliance with Public Resources Code §21080.3.1 (d) and the tribe failed to request consultation within 30 days. (Pub. Resources Code §21082.3 (d)).

The NAHC's PowerPoint presentation titled, "Tribal Consultation Under AB 52: Requirements and Best Practices" may be found online at: http://nahc.ca.gov/wp-content/uploads/2015/10/AB52TribalConsultation_CalEPAPDF.pdf

SB 18

SB 18 applies to local governments and requires local governments to contact, provide notice to, refer plans to, and consult with tribes prior to the adoption or amendment of a general plan or a specific plan, or the designation of open space. (Gov. Code §65352.3). Local governments should consult the Governor's Office of Planning and Research's "Tribal Consultation Guidelines," which can be found online at: https://www.opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf

Some of SB 18's provisions include:

1. **Tribal Consultation:** If a local government considers a proposal to adopt or amend a general plan or a specific plan, or to designate open space it is required to contact the appropriate tribes identified by the NAHC by requesting a "Tribal Consultation List." If a tribe, once contacted, requests consultation the local government must consult with the tribe on the plan proposal. **A tribe has 90 days from the date of receipt of notification to request consultation unless a shorter timeframe has been agreed to by the tribe.** (Gov. Code §65352.3 (a)(2)).
2. **No Statutory Time Limit on SB 18 Tribal Consultation.** There is no statutory time limit on SB 18 tribal consultation.
3. **Confidentiality:** Consistent with the guidelines developed and adopted by the Office of Planning and Research pursuant to Gov. Code §65040.2, the city or county shall protect the confidentiality of the information concerning the specific identity, location, character, and use of places, features and objects described in Public Resources Code §5097.9 and §5097.993 that are within the city's or county's jurisdiction. (Gov. Code §65352.3 (b)).
4. **Conclusion of SB 18 Tribal Consultation:** Consultation should be concluded at the point in which:
 - a. The parties to the consultation come to a mutual agreement concerning the appropriate measures for preservation or mitigation; or
 - b. Either the local government or the tribe, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached concerning the appropriate measures of preservation or mitigation. (Tribal Consultation Guidelines, Governor's Office of Planning and Research (2005) at p. 18).

Agencies should be aware that neither AB 52 nor SB 18 precludes agencies from initiating tribal consultation with tribes that are traditionally and culturally affiliated with their jurisdictions before the timeframes provided in AB 52 and SB 18. For that reason, we urge you to continue to request Native American Tribal Contact Lists and "Sacred Lands File" searches from the NAHC. The request forms can be found online at: <http://nahc.ca.gov/resources/forms/>

NAHC Recommendations for Cultural Resources Assessments

To adequately assess the existence and significance of tribal cultural resources and plan for avoidance, preservation in place, or barring both, mitigation of project-related impacts to tribal cultural resources, the NAHC recommends the following actions:

1. Contact the appropriate regional California Historical Research Information System (CHRIS) Center (http://ohp.parks.ca.gov/?page_id=1068) for an archaeological records search. The records search will determine:
 - a. If part or all of the APE has been previously surveyed for cultural resources.
 - b. If any known cultural resources have already been recorded on or adjacent to the APE.
 - c. If the probability is low, moderate, or high that cultural resources are located in the APE.
 - d. If a survey is required to determine whether previously unrecorded cultural resources are present.
2. If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - a. The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum and not be made available for public disclosure.
 - b. The final written report should be submitted within 3 months after work has been completed to the appropriate regional CHRIS center.

3. Contact the NAHC for:
 - a. A Sacred Lands File search. Remember that tribes do not always record their sacred sites in the Sacred Lands File, nor are they required to do so. A Sacred Lands File search is not a substitute for consultation with tribes that are traditionally and culturally affiliated with the geographic area of the project's APE.
 - b. A Native American Tribal Consultation List of appropriate tribes for consultation concerning the project site and to assist in planning for avoidance, preservation in place, or, failing both, mitigation measures.
4. Remember that the lack of surface evidence of archaeological resources (including tribal cultural resources) does not preclude their subsurface existence.
 - a. Lead agencies should include in their mitigation and monitoring reporting program plan provisions for the identification and evaluation of inadvertently discovered archaeological resources per Cal. Code Regs., tit. 14, §15064.5(f) (CEQA Guidelines §15064.5(f)). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American with knowledge of cultural resources should monitor all ground-disturbing activities.
 - b. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the disposition of recovered cultural items that are not burial associated in consultation with culturally affiliated Native Americans.
 - c. Lead agencies should include in their mitigation and monitoring reporting program plans provisions for the treatment and disposition of inadvertently discovered Native American human remains. Health and Safety Code §7050.5, Public Resources Code §5097.98, and Cal. Code Regs., tit. 14, §15064.5, subdivisions (d) and (e) (CEQA Guidelines §15064.5, subs. (d) and (e)) address the processes to be followed in the event of an inadvertent discovery of any Native American human remains and associated grave goods in a location other than a dedicated cemetery.

If you have any questions or need additional information, please contact me at my email address: Steven.Quinn@nahc.ca.gov.

Sincerely,



for
Steven Quinn
Associate Governmental Program Analyst

cc: State Clearinghouse

From: [Smartsheet Notifications](#)
To: [MARTINEZ-SIDHOM, BRENDA](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Wednesday, April 17, 2019 6:47:54 PM

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Changes since 4/17/19 6:45 PM

2 rows added

2 rows added or updated (shown in **yellow**)

		Row ID	Full Name	Company Name	Email Address	Comments	Created	Project
		17	Anita Bevelheimer	Westchester Resident	anitabev@icloud.com	Thank you so much for having this meeting. I'm really impressed by the detail of work that has been put into this project. The northbound Sepulveda tunnel is a nightmare, and I appreciate moving the entrance to the airport being moved far from it. I hope that this project will look into improving the lack of lighting in the tunnel. My favorite part of this project the APM!!!!!! I would use this ALL the time to avoid having to drive into the airport to be drop off or to pick up visitors. Thank you so much for this!!!	04/17/19 6:45 PM	ATMP
		18	Montana Brickner-French	LAWA-Airport Police	mbricknerfrench@lawa.org	Such an amazing an informational presentation from this team. Brenda greeted me and answered any question I had, as well as each team member that was at each panel. Learned a lot and am very excited for this new development at LAX. Great work!	04/17/19 6:47 PM	ATMP

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LAX Airfield and Terminal Modernization Project

The purpose of the CEQA scoping process and the scoping meeting is to provide an opportunity for the public and responsible or trustee agencies to provide input regarding the scope and content of the Draft EIR for the LAX Airfield and Terminal Modernization Project, particularly the significant environmental issues and reasonable alternatives and mitigation measures they think should be analyzed or considered. Written comments can be submitted at the public scoping meetings or mailed no later than 5:00 p.m. on May 6, 2019. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope of the Draft EIR for the proposed Project. Your comments will be considered during preparation of the Draft EIR.

Written Comment Form

Name: Land, Carolyn
 Affiliation (i.e. organization, resident, business): _____
 Address: 8909 Rayford Dr LA 90045
 Phone/Cell: _____
 Email: seantwoe@aol.com

Thank you for your interest in the LAX Airfield and Terminal Modernization Project. We welcome your comments.

- ① Where or what will happen with the Post office on Westchester Parkway? We do not know why it has to be removed. The P.O. will leave in ~ 4 years.
- ② Why will the people move not stop at the Terminal? Example Stop for 1 & 0 is almost at 2:5. That appears to be a long distance to get to 1 & 0 7/8. I don't understand why that happens.
- ③ What arrangements are made for people with disabilities?
- ④ Amount of time to get to flight seems to have increased by 2-3 hours. Now if I arrive 1 hour before flight, I am fine without any problem.

WRITTEN COMMENTS: Please place comments in the "comment box" at the public scoping meeting or mail to:

Evelyn Quintanilla, Chief of Airport Planning II
 Los Angeles World Airports
 P.O. Box 92216
 Los Angeles, California, 90009-2216

Comments can also be provided online at www.lawa.org/ATMP

All comments must be received, not postmarked, by 5:00 p.m., May 6, 2019.

This form can simply be folded and placed in a mailbox. Please remember to add postage.

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Written Comment Form

Name: Land, Carolyn
Affiliation (i.e. organization, resident, business): _____
Address: 8909 Rayford Dr LA 90045
Phone/Cell: _____
Email: seatwoc@aol.com

Thank you for your interest in the LAX Airfield and Terminal Modernization Project. We welcome your comments.

What will be the pickup for
Uber & Lyft?

WRITTEN COMMENTS: Please place comments in the "comment box" at the public scoping meeting or mail to:

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Los Angeles World Airports
P.O. Box 92216
Los Angeles, California, 90009-2216

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Written Comment Form

Name:

ESTER HOROMPOLY

Affiliation (i.e. organization,
resident, business):

Resident

Address:

7455 West 91st Street, Los Angeles, CA 90045

Phone/Cell:

310 645-0153 (please leave message)

Email:

Thank you for your interest in the LAX Airfield and Terminal Modernization Project. We welcome your comments.

I am living in Westchester since 1974.
I worked for UNITED AIRLINES 34 years.
My complain is re the TUNNEL on Sepulveda.
Suppose travelers land in LA and have recreation
in the area of Disneyland, The first you see
is the dark, dirty, not nice tunnel. Why can
LAWA not pay attention to that important issue.
Young artist could make some nice SIGNS like
"Welcome to LA", "California", etc. Ester Horompoly

WRITTEN COMMENTS: Please place comments in the "comment box" at the public scoping meeting or mail to:

Evelyn Quintanilla, Chief of Airport Planning II
Los Angeles World Airports
P.O. Box 92216
Los Angeles, California, 90009-2216

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LAX Airfield and Terminal Modernization Project

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Written Comment Form

Name: Joe Guglielmo
Affiliation (i.e. organization, resident, business): Resident
Address: 433 W. MANCHESTER AVE 90043
Phone/Cell: 310 823 2502
Email: pdjoe2003@yahoo.com

Thank you for your interest in the LAX Airfield and Terminal Modernization Project. We welcome your comments.

THIS SEEMS LIKE IT WOULD CREATE MORE OF A MESS THAN HELPING
THE MODELS ARE NOT CORRECT - YOUR TRAFFIC IDEA IS A PIPE DREAM
AND NOT REALISTIC - GET SOMEONE WHO KNOWS TRAFFIC TO WORK
ON THE PLAN - PLEASE.
WHY EVEN HAVE CARS GOING INTO LAX - HAVE THE PEOPLE MOVE
ONLY GO IN AND DROP TRAVELERS OFF AT THE MAIN PEOPLE MOVE
STATION - NO CARS IN LAX - LESS TRAFFIC.

WRITTEN COMMENTS: Please place comments in the "comment box" at the public scoping meeting or mail to:

Evelyn Quintanilla, Chief of Airport Planning II
Los Angeles World Airports
P.O. Box 92216
Los Angeles, California, 90009-2216

Comments can also be provided online at www.lawa.org/ATMP

All comments must be received, not postmarked, by 5:00 p.m., May 6, 2019.

This form can simply be folded and placed in a mailbox. Please remember to add postage.

You made this form too small!!!
Evelyn

LAX Airfield and Terminal Modernization Project

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Written Comment Form

Name: Weisbrich Monica
 Affiliation (i.e. organization, resident, business): Resident
 Address: 8312 Bedford Ave 90045
 Phone/Cell: 310/645-8216
 Email: weisbricha@aol.com

Thank you for your interest in the LAX Airfield and Terminal Modernization Project. We welcome your comments.

1. Again your graphics are quite misleading - out of scale - especially for people who live & know the area.
- 2 - What is going to happen to the Post office of the Westway & airport. Getting mixed messages tonight.
- 3 - You need to quit say saying Metro & the lite rail will meet and go into LAX.
4. unclear how folks get from Lot E to the

WRITTEN COMMENTS: Please place comments in the "comment box" at the public scoping meeting or mail to:

the terminal. more shuttle buses!!!
 Evelyn Quintanilla, Chief of Airport Planning II

Los Angeles World Airports

P.O. Box 92216
 Los Angeles, California, 90009-2216

Comments can also be provided online at www.lawa.org/ATMP

All comments must be received, not postmarked, by 5:00 p.m., May 6, 2019.

This form can simply be folded and placed in a mailbox. Please remember to add postage.

5/ when project completed passengers will need to arrive to LAX **THREE** hours b4 their flight!!!
 6/ where are you with ADA? go from terminal to term. 0 to field gate. That's a long way!!!

LAX Airfield and Terminal Modernization Project

The purpose of the CEQA scoping process and the scoping meeting is to provide an opportunity for the public and responsible or trustee agencies to provide input regarding the scope and content of the Draft EIR for the LAX Airfield and Terminal Modernization Project, particularly the significant environmental issues and reasonable alternatives and mitigation measures they think should be analyzed or considered. Written comments can be submitted at the public scoping meetings or mailed no later than 5:00 p.m. on May 6, 2019. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope of the Draft EIR for the proposed Project. Your comments will be considered during preparation of the Draft EIR.

Written Comment Form

Name: Rae Lamothe
 Affiliation (i.e. organization, resident, business): Resident + Business Owner
 Address: 17 7301 Vista del Mar A. 106 PDR 90293
 Phone/Cell: 310-702-2939
 Email: RAE@GOLDINGLAMOTHE.COM

Thank you for your interest in the LAX Airfield and Terminal Modernization Project. We welcome your comments.

Anything that improves capacity and efficiency is ok by me



WRITTEN COMMENTS: Please place comments in the "comment box" at the public scoping meeting or mail to:

Evelyn Quintanilla, Chief of Airport Planning II
 Los Angeles World Airports
 P.O. Box 92216
 Los Angeles, California, 90009-2216

Comments can also be provided online at www.lawa.org/ATMP

All comments must be received, not postmarked, by 5:00 p.m., May 6, 2019.

This form can simply be folded and placed in a mailbox. Please remember to add postage.

From: [Smartsheet Notifications](#)
To: [MARTINEZ-SIDHOM, BRENDA](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Wednesday, April 17, 2019 6:09:32 PM



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[Our LAX Comment Form \(Prod\)](#)

Changes since 4/17/19 6:07 PM

1 row added

1 row added or updated (shown in **yellow**)

Row 16

Row ID	16
Full Name	Tonya Dooley
Company Name	HLB Lighting Design
Email Address	tdooley@hlblighting.com
Comments	Looks great! Thanks for your commitment to making LAX a world-class airport that represents Los Angeles as a progressive, world class city!
Created	04/17/19 6:07 PM
Project	ATMP

Changes made by web-form@smartsheet.com

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CITY OF LOS ANGELES

CALIFORNIA

Seleta J. Reynolds
GENERAL MANAGER



ERIC GARCETTI
MAYOR

DEPARTMENT OF TRANSPORTATION
100 South Main Street, 10th Floor
Los Angeles, California 90012
(213) 972-8470
FAX (213) 972-8410

April 18, 2019

Evelyn Quintanilla
Chief of Airport Planning II
Los Angeles World Airports
P.O.Box 92216
Los Angeles, California 90009-2216

Subject: **FORMAL SCOPING COMMENTS TO THE AIRPORT AIRFIELD & TERMINAL
MODERNIZATION PROJECT, NOTICE OF PREPARATION/INITIAL STUDY (NOP/IS)**

Dear Ms. Quintanilla:

In response to the Airport Airfield & Terminal Modernization Project's NOP/IS, the City of Los Angeles Department of Transportation (LADOT) respectfully submits the following comments / requests:

- 1) That the Project Traffic Impact Analysis Scope requires approval from the LADOT Planning and Development Review Division and that all aspects of the project traffic analysis adhere to the latest LADOT Traffic Study Policies and Procedures
- 2) That the project appropriately considers all potential regional mobility improvement projects discussed in the City of Los Angeles Westside Mobility Plan, particularly the proposed capacity enhancement projects along Lincoln Boulevard and all other major corridors leading to the Airport, as a way of mitigating any possible impacts this project may cause.

Finally, to achieve the best possible outcome for this important project and a smooth approval process for the environmental document, I strongly recommend discussing all aspects of your traffic study with us, very early on in the process. Continued collaboration during the course of this study, will result in our full endorsement of your methods and findings when the environmental document is published for public review and comment.

Sincerely

Sean Haeri,
Sr. Transportation Engineer

c: Jay Kim, Tomas Carranza LADOT Development Services / Review

CITY OF LOS ANGELES
INTER-DEPARTMENTAL CORRESPONDENCE

DATE: April 23, 2019

TO: Evelyn Quintanilla, Chief of Airport Planning II
Los Angeles World Airports

FROM:  Ali Poosti, Division Manager
Wastewater Engineering Services Division
LA Sanitation and Environment

SUBJECT: LAX AIRFIELD & TERMINAL MODERNIZATION PROJECT - NOTICE OF PREPARATION / INITIAL STUDY

This is in response to your Notice of Preparation/Initial Study letter requesting a review of your proposed airfield enhancements, new terminal facilities, and improved system of roadways to increase efficiency, safety, passenger processing capabilities, customer experience, and reduce congestion located at Los Angeles International Airport (North Airfield, Concourse 0 and Terminal 9). LA Sanitation, Wastewater Engineering Services Division has received and logged the notification on April 23, 2019. Based on the project description, it has been determined there are not enough sufficient details to perform a hydraulic analysis at this time. Please continue to send us information so that we may conduct an appropriate sewer assessment for the project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at chris.demonbrun@lacity.org

CD/AP: al

c: Kosta Kaporis, LASAN
Cyrous Gilani, LASAN
Christopher DeMonbrun, LASAN

From: Robert Dorame <gtongva@gmail.com>
Sent: Tuesday, April 23, 2019 6:01 PM
To: OWEN, JAMES L. <JOWEN@lawa.org>
Subject: Fwd: G.T.I.O.C. LAX Modernization proposal

Sent from my iPad

Begin forwarded message:

From: Robert Dorame <gtongva@gmail.com>
Date: April 22, 2019 at 7:32:52 PM PDT
To: JOWEN@kawa.org
Subject: G.T.I.O.C. LAX Modernization proposal

1 of 2

Sent from my iPad

Begin forwarded message:

From: Robert F. Dorame
Cultural Consultant
Gabrielino Tongva Indian of CA

To: James L. Owen for Evelyn Quintanilla
Los Angeles World Airports
Environmental & Land Use Planning

The following documents are included in this message.

- 1) Treatment Plan
- 2) Monitoring Recommendation
- 3) Encountering Human Remains/Pre-Historic

I have not been able to schedule a conference call with your department due to my computer going down and I deeply apologize for the delay.

The areas of development may impact known culturally sensitive resources which have been observed during archaeological work just west or just outside of the development planned in this phase by monitors from our tribe approximately during 2014 - 16.

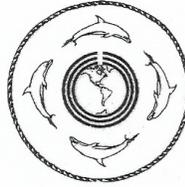
Therefore, native monitoring will be required during all soil disturbances to insure the project will meet the intention of laws written to protect and mitigate any culturally sensitive materials or in the event that human remains are uncovered during soil disturbances.

I look forward to consultation but I will be unable to participate unless we could

schedule this at 4 PM any weekday or on a Saturday. I have a commitment that is winding down that requires me to provide my services at this time. I'm sorry for this request but I think you would want to be able to question me since I was in charge of the monitoring described above.

Thank you for your patience and again, I'm really sorry I couldn't respond before today.

Best regards
Robert Dorame
562-761-6417



GABRIELINO TONGVA INDIANS OF CALIFORNIA

P.O. Box 490, Bellflower, CA 90707

gtongva@gmail.com

(562) 761-6417

**GABRIELINO TONGVA INDIANS OF CALIFORNIA PROCEDURES FOR THE TREATMENT
AND DISPOSITION OF HUMAN REMAINS AND ASSOCIATED GRAVE GOODS AT
GABRIELINO TONGVA ANCESTRAL SITES**

The borders of the Gabrielino Tongva Nation's territory extends clockwise along the Santa Susanna and San Gabriel Mountains, through Cucamonga to Redlands, south through Riverside, veering southwest past Lee Lake to Aliso Creek and up the coast of the Pacific Ocean to the Malibu area. In addition, San Clemente, Sana Catalina and San Nicholas Islands are included in the nation's territory. Individual Gabrielino Tongva tribes affiliate with territories based on ancient village sites. Members of tribes many times have lineal descendancy to more than one village site, due to marriages between tribes within the nation.

CULTURAL RESOURCES AND LAND DEVELOPMENT

The required Environmental Report (EIR) shall include the consultation of a Gabrielino Tongva Indian cultural consultant prior to submission of the draft EIR to the appropriate government entities to insure all steps have been taken to identify culturally sensitive and non-culturally sensitive areas. Sensitive areas are defined as places that are likely to contain human remains, associated grave goods and patrimonial objects. Conducting consultation under the California Environmental Act AB 52 Insures on going communication between the client and the tribe. All verified tribes that affiliate with Tongva and/or Gabrielino must be contacted for the opportunity to consult with the client.

If a culturally sensitive area is identified, an archaeological survey must be completed before any grading or excavation with machines take place. The survey must be conducted by a qualified archaeologist who is knowledgeable and experienced in working in Gabrielino Tongva territory. If an archaeologist has little or no experience in the Gabrielino Tongva territory, a qualified, experienced Gabrielino Tongva cultural consultant will assist in the archaeological survey.

TREATMENT PLAN FOR HUMAN REMAIN DISCOVERY

In the event that human remains, associated grave goods, patrimonial or sacred items are encountered during excavation, all construction must be halted until the proper authorities, to include the local coroner and law enforcement, make a determination and a formal review of the find is evaluated. The county coroner has the legal responsibility for determining whether or not the remains are American Indian or not. If they are of Indian descent, the Native American Heritage Commission will be contacted by the coroner under the California Health and Safety Code (Senate Bill 297, Chapter 1492, Statutes of 1982 and Section 7050.50) A Most Likely Descendent (M.L.D) will be assigned by the N.A.H.C. to take care of the ancestor or ancestors with dignity and respect (public resource code 5097.98) A certified osteologist will be retained to verify human remains authenticity and work to help remove ancestors from the site area with the discretion and advise from the M.L.D. Native American monitors assigned to the project will assist the osteologist and archaeological monitors in the recovery process. It will be the determination by the M.L.D. where the ancestors will be housed until a final decision is made for the reinterment of the ancestor.

CONFIDENTIALITY

Any information provided about the location of an archeological or sacred site by our tribal cultural consultant must not be disclosed or published for public viewing, to include any reports either preliminary or final and must be kept confidential.



GABRIELINO TONGVA INDIANS OF CALIFORNIA

P.O. Box 490, Bellflower, CA 90707

gtongva@gmail.com

(562) 761-6417

CULTURAL RESOURCE MONITORING RECOMMENDATIONS

A qualified and certified Indian monitor from our tribe will oversee all mechanical and hand soil disturbances including asphalt, cement, slurry and redeposited fill sediments and not limited to brush, vegetation, tree and grubbing removal.

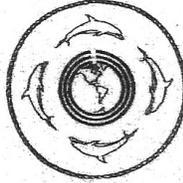
The monitor will be responsible for observing all mechanical and hand labor excavations to include paddle scrapers, blade machines, front-end loaders, back hoe, boring and drill operations to include hydraulic and electric chisels. Shovel laborers and their associated tools such as picks and other non electric or gasoline tools that are not regarded as mechanical will be monitored.

Soils that are removed from the excavation area and are considered culturally sensitive are subject to inspection. These soils whether placed in dump trucks or spoils piles are to be inspected. The monitor will temporarily hold excavations until a determination is made whether soils contain cultural sensitive material or not. If soils are sensitive, a archaeological monitor will verify find and notify site supervisor.

The N.A.M. may make recommendations during the course of the project when a cultural area has been impacted. The N.A.M. will be empowered to halt or redirect excavation activities to another area, both archaeological and native monitors will work together to insure that area is warranted as being culturally sensitive before this decision is made. Avoidance and directing an alternative route from this culturally sensitive area is highly recommended.

Any artifacts associated with the site and that are not associated with any burials, are subject to collection by the designated archaeologist for purposes of data and information vital for their final report. Our NAM do not collect artifacts for any reason, ever. This might jeopardize site orientation and successful data recovery. Only an archaeologist can remove material for their reports. The land owner will work with Tongva members to insure that a proper repository is established. A final report will be issued to the cultural consultant by the archaeological company.

It is the sole responsibility of the Indian monitor from our tribe to provide to the client a written daily field report with photos of his/hers account of the daily activities. A perspective of daily activities by an native monitor will enhance the information gathered by the field archaeologist.



Gabrielino Tongva Indians of California Recovery and Reburial Procedures

There are certain methods developed by the Gabrielino Tongva Indians of California that are required when removing Gabrielino Tongva Remains from the earth. Conditions may occur that could alter one or more issues on this list. Consultation with the most likely descendent (MLD) and the Native American monitors assigned to the site should then be scheduled to determine other procedures that may be acceptable to the Gabrielino Tongva people.

Excavation:

1. Consultation between the MLD and the archaeological firm must take place when remains are unearthed and prior to any action taken.
2. A 50 foot perimeter for each uncovered burial will be required to safeguard further destruction until the area is examined for additional remains and associated grave goods.
3. In the event blade machines are operating in an adjacent area, a maximum of 2" cuts or less will be permitted in all cultural areas.
4. Additional monitors must be required if more than one area is being excavated at the same time. Each excavated burial will be monitored exclusively.
5. Wooden tools are preferred; electric chisels or other power tools should be avoided.
6. If remains are pedestaled, they will be placed on plywood for removal. If remains cannot be pedestaled due to soil conditions, remains must be carefully placed in cloth bags.
7. Soils adjacent to burials will be saved for reburial in plastic containers.
8. No photography, digital or video is allowed. Drawings of remains will be permitted to retain the orientation of the ancestors for re-interment purposes only. If the Coroner photographs the remains, the photos may not be published for any purpose.

Testing:

1. DNA testing with discretion and approval of the MLD.
2. No invasive testing is allowed.
3. Macroscopic analysis is permitted.
4. Shell associated with each burial may be used for dating purposes.
5. When remains are unearthed, the 1'x1' test pits will be allowed to determine the extent of the burial area when necessary.
6. All windrows within a 50 foot area must be dry or wet screened.

Storage:

1. Natural Cotton bags and sheeting or cotton drop cloths will be used to store remains until time of re-interment. Deer or other native hides maybe used to cover the bagged and wrapped remains until time of reburial and may become the burial wrapping.
2. Until scope of project is completed, storage of ancestors should be in close proximity to location of excavation or a protected area must be provided by the landowner or archaeologist.
3. Bone fragments will be bagged in natural cotton.

Reburial:

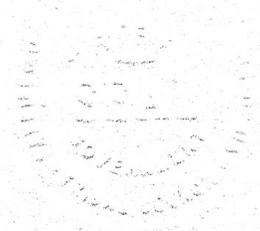
1. If at all possible, remains should stay within the same location or in as close proximity to the removal as possible, preferably within a ½ mile radius of the original grave site. When no appropriate location can be identified within this radius, a secure location will be valued over distance.
2. If the preponderance of remains is uncovered in or excavated from one area, the re-interment should be in that area.
3. The reburial site should offer the best long-term protection against any additional disturbances.
4. Each reburial requires approximately 4' x 5 ½' when fully articulated and should be at a depth of 6 – 10 feet. The purpose of this depth is to insure difficulty in disturbing the reburial and to allow adequate room for capping if necessary.

5. Any isolated bone fragments uncovered on site may be buried together in an individual burial pit with indigenous animal skins, sea weed or the natural cloth used for all bagged fragments.
6. All associated grave goods and artifacts along with soils will be reentered with the ancestors.
7. No drawings or any other images of ancestral remains may be used for publication without consultation and the approval of the Native American Monitors and the appointed MLD for the site.

Costs:

1. The landowner(s) will be responsible for all costs related to the proper storage and reburial of remains excavated on their property to include all burial materials required in this document.
2. Landowner(s) will be financially responsible for providing reburial plots that are acceptable and approved by the MLD.

Revised 01/01/15



From: [Smartsheet Notifications](#)
To: [MARTINEZ-SIDHOM, BRENDA](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Wednesday, April 24, 2019 5:19:25 AM



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[Our LAX Comment Form \(Prod\)](#)

Changes since 4/24/19 5:17 AM

1 row added , 1 row changed

1 attachment added

1 row added or updated (shown in **yellow**)

Row 19

Row ID	19
Full Name	Jay Chung
Company Name	N/A
Email Address	jays.email@yahoo.com
Comments	Attn to: Evelyn Quintanilla, I'm a resident of West L.A. situated nearby LAX & have been affected from the air pollution the planes have emitted from their jet streams throughout the past several years. I'd wish to have my voice heard by adding that there should be a change in the planes air combustion to avoid the many several health effects that emit from planes departing & arriving at the runway terminals. It has been a devastating nightmare over the years to constantly upkeep w/ cleanliness of window mesh screens where pollution clings onto and enters thru; including around crevices where pollution enters thru and builds-up black mold residue over time. My best logical advise for future airbus traveling would be to immediately replace all conventional jet fueled planes with more eco-friendly type hybrids that are Ultra Low Emitting to avoid all the negative health concerns spiraling around the media & nearby frustrated residencies. Dangers of Plane Pollution Article: https://news.nationalgeographic.com/news/2010/10/101005-planes-pollution-deaths-science-environment/
Created	04/24/19 5:17 AM
Project	ATMP

Changes made by web-form@smartsheet.com



1 attachment added



[Aviation Pollution Problem.jpg \(156k\)](#) added by web-form@smartsheet.com
on Row 19: Jay Chung

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<https://www.nationalgeographic.com/news/2010/10/101005-planes-pollution-deaths-science-environment.html>

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Plane Exhaust Kills More People Than Plane Crashes

Toxic pollutants kill at least ten thousand annually, study says.

BY MASON INMAN, FOR NATIONAL GEOGRAPHIC NEWS

PUBLISHED OCTOBER 10, 2010

There's a new fear of flying: You're more likely to die from exposure to toxic pollutants in plane exhaust than in a plane crash, a new study suggests.

In recent years, airplane crashes have killed about a thousand people annually, whereas plane emissions kill about ten thousand people each year, researchers say.

Earlier studies had assumed that people were harmed only by the emissions from planes while taking off and landing. The new research is the first to give a comprehensive estimate of the number of premature deaths from all airline emissions.

"We found that unregulated emissions from [planes flying] above 3,000 feet [914 meters] were responsible for most of the deaths," said study leader Steven Barrett, an aeronautical engineer at the Massachusetts Institute of Technology in Cambridge.

Airplane exhaust, like car exhaust, contains a variety of air pollutants, including sulfur dioxide and nitrogen oxides.

(Related: ["Pollution Can Change Your DNA in 3 Days, Study Suggests."](#))

Many of these particles of pollution are tiny, about a hundred millionths of an inch wide, or smaller than the width of a human hair.

So-called particulate matter that's especially small is the main culprit in human health effects, especially since the particulates can become wedged deep in the lung and possibly enter the bloodstream, scientists say.

Tracking Toxic Plane Pollution

Barrett and colleagues used a computer model that brought together records of flight paths, the average amount of fuel burned during flights, and their estimated emissions.

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By comparing this data with another atmospheric model, the team was able to track how plane pollutants are likely to move and where the pollutants are most likely to fall to the surface, where people breathe them in.

The study also looked at how human populations are spread around the planet to estimate how the patterns of airplane pollution might up the risk of death. ([Test your knowledge of toxic disasters.](#))

Globally, the team estimated that about 8,000 deaths a year result from pollution from planes at cruising altitude—about 35,000 feet (10,668 meters)—whereas about 2,000 deaths result from pollution emitted during takeoffs and landings.

The most common causes of death due to air pollution are cardiovascular and respiratory diseases, including lung [cancer](#), according to the UN's World Health Organization.

Not in Your Backyard

The locations with the most active airports aren't always the ones that suffer the biggest health impacts, the study suggests.

When a plane flies at cruising altitude above the clouds, wind currents can whisk the pollution far away so that prevailing winds cause the pollution to fall from the sky about 6,000 miles (10,000 kilometers) to the east of the plane's route.

(Also see ["Pollution From U.S., Europe, Others Speeding Arctic Warming, Study Says."](#))

The [United States](#) incurs about 450 deaths each year from airplane emissions—only about one-seventh the number of deaths that would be expected if the pollution fell straight to the ground from planes, the study said.

In [India](#), on the other hand, there are an estimated 1,640 deaths per year from airplane emissions—about seven times more deaths than would be expected based on the number of flights that start or finish in the country.

Most of these deaths are caused not by flights over India but from emissions in Europe and North America at high altitude, which then blow across Asia, according to the study, published in the October issue of [Environmental Science & Technology](#).

Airplane Pollution Stoppable

Airplane pollution deaths still represent a small share of the toll from all kinds of air pollution.

Emissions from ships, for instance, kill an estimated 60,000 people a year, according to a 2007 study also published in [Environmental Science & Technology](#).

And the annual total death toll from air pollution is about a million, according to the [United Nations Environment Programme](#).

However, Barrett said, "aviation is growing fast, so we need to start now" on curbing the death rate.

"Regulators need to explicitly consider the impact of cruise emissions on human health," he added.

Sulfur in jet fuel is a major killer, but for a small additional cost "on the order of [U.S.] five cents a gallon, you can remove the vast majority of the sulfur," he said.

[Junfeng Liu](#), an atmospheric chemist at Princeton University, said the "excellent" study delves into "an important global

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Indeed the findings may someday influence U.S. policy, according to Lourdes Maurice, the U.S. Federal Aviation Administration's chief scientific and technical adviser for environment.

If the findings hold up during future studies, then the aviation agency will consider how to regulate airplane emissions to cut their health impact, Maurice said.

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From: Anita Au <au@scag.ca.gov>
Sent: Wednesday, May 01, 2019 8:15 AM
To: QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>
Cc: Ping Chang <CHANG@scag.ca.gov>; Hiroshi Ishikawa <ishikawa@scag.ca.gov>
Subject: SCAG Comments on the NOP of a DEIR for the Airfield & Terminal Modernization Project [SCAG NO. IGR9869]

Good morning Evelyn,

Please find attached SCAG Comments on the NOP of a DEIR for the Airfield & Terminal Modernization Project [SCAG NO. IGR9869].

Please contact me at (213) 236-1874 or au@scag.ca.gov if you have further questions or difficulties with the attached file.

Thank you!



Anita Au

Associate Regional Planner

Tel: (213) 236-1874

au@scag.ca.gov

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

900 Wilshire Blvd., Ste. 1700, Los Angeles, CA 90017



Join us for **SCAG's 2019 Regional Conference & General Assembly, "Beyond Boundaries"**
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May 1, 2019

Ms. Evelyn Quintanilla, Chief of Airport Planning II
Los Angeles World Airport
P.O. Box 92216
Los Angeles, California 90009-2216
Phone: (800) 919-3766
E-mail: equintanilla@lawa.org

RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the Airfield & Terminal Modernization Project [SCAG NO. IGR9869]

Dear Ms. Quintanilla,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the Airfield & Terminal Modernization Project ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for Federal financial assistance and direct Federal development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including the Sustainable Communities Strategy (SCS) pursuant to Senate Bill (SB) 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.¹ SCAG's feedback is intended to assist local jurisdictions and project proponents to implement projects that have the potential to contribute to attainment of Regional Transportation Plan/Sustainable Community Strategies (RTP/SCS) goals and align with RTP/SCS policies.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the Airfield & Terminal Modernization Project. The proposed project includes three components: (1) airfield improvements to the North Airfield, (2) terminal improvements to concourse 0 and terminal 9, and (3) roadway improvements to improve access to the Central Terminal Area (CTA).

When available, please send environmental documentation to SCAG's Los Angeles office in Los Angeles (900 Wilshire Boulevard, Ste. 1700, Los Angeles, California 90017) or by email to au@scag.ca.gov providing, at a minimum, the full public comment period for review.

If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Anita Au, Associate Regional Planner, at (213) 236-1874 or au@scag.ca.gov. Thank you.

Sincerely,

Ping Chang
Manager, Compliance and Performance Monitoring

¹ Lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the 2016 RTP/SCS for the purpose of determining consistency for CEQA. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a determination of consistency with the 2016 RTP/SCS for CEQA.

**COMMENTS ON THE NOTICE OF PREPARATION OF A
DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE
AIRFIELD & TERMINAL MODERNIZATION PROJECT [SCAG NO. IGR9869]**

CONSISTENCY WITH RTP/SCS

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS. For the purpose of determining consistency with CEQA, lead agencies such as local jurisdictions have the sole discretion in determining a local project's consistency with the RTP/SCS. For regionally significant transportation projects, should major project changes (i.e. change in scope, completion year, and/or costs) take place as result of the environmental review process that are not consistent with the latest RTP/SCS project sponsors should consult with their County Transportation Commission (CTC) to request for SCAG to amend the RTP/SCS to include the latest project information.

2016 RTP/SCS GOALS

The SCAG Regional Council adopted the 2016 RTP/SCS in April 2016. The 2016 RTP/SCS seeks to improve mobility, promote sustainability, facilitate economic development and preserve the quality of life for the residents in the region. The long-range visioning plan balances future mobility and housing needs with goals for the environment, the regional economy, social equity and environmental justice, and public health (see <http://scagrtpsc.net/Pages/FINAL2016RTPSCS.aspx>). The goals included in the 2016 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2016 RTP/SCS are the following:

SCAG 2016 RTP/SCS GOALS	
RTP/SCS G1:	<i>Align the plan investments and policies with improving regional economic development and competitiveness</i>
RTP/SCS G2:	<i>Maximize mobility and accessibility for all people and goods in the region</i>
RTP/SCS G3:	<i>Ensure travel safety and reliability for all people and goods in the region</i>
RTP/SCS G4:	<i>Preserve and ensure a sustainable regional transportation system</i>
RTP/SCS G5:	<i>Maximize the productivity of our transportation system</i>
RTP/SCS G6:	<i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (e.g., bicycling and walking)</i>
RTP/SCS G7:	<i>Actively encourage and create incentives for energy efficiency, where possible</i>
RTP/SCS G8:	<i>Encourage land use and growth patterns that facilitate transit and active transportation</i>
RTP/SCS G9:	<i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies*</i>
<small>*SCAG does not yet have an agreed-upon security performance measure.</small>	

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the goals and supportive analysis in a table format. Suggested format is as follows:

SCAG 2016 RTP/SCS GOALS	
Goal	Analysis
RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>	<i>Consistent: Statement as to why; Not-Consistent: Statement as to why; Or Not Applicable: Statement as to why; DEIR page number reference</i>
etc.	etc.

2016 RTP/SCS STRATEGIES

To achieve the goals of the 2016 RTP/SCS, a wide range of land use and transportation strategies are included in the 2016 RTP/SCS. Technical appendances of the 2016 RTP/SCS provide additional supporting information in detail. To view the 2016 RTP/SCS, please visit: <http://scagrtpscs.net/Pages/FINAL2016RTPSCS.aspx>. The 2016 RTP/SCS builds upon the progress from the 2012 RTP/SCS and continues to focus on integrated, coordinated, and balanced planning for land use and transportation that the SCAG region strives toward a more sustainable region, while the region meets and exceeds in meeting all of applicable statutory requirements pertinent to the 2016 RTP/SCS. These strategies within the regional context are provided as guidance for lead agencies such as local jurisdictions when the proposed project is under consideration.

DEMOGRAPHICS AND GROWTH FORECASTS

Local input plays an important role in developing a reasonable growth forecast for the 2016 RTP/SCS. SCAG used a bottom-up local review and input process and engaged local jurisdictions in establishing the base geographic and socioeconomic projections including population, household and employment. At the time of this letter, the most recently adopted SCAG jurisdictional-level growth forecasts that were developed in accordance with the bottom-up local review and input process consist of the 2020, 2035, and 2040 population, households and employment forecasts. To view them, please visit <http://www.scag.ca.gov/Documents/2016GrowthForecastByJurisdiction.pdf>. The growth forecasts for the region and applicable jurisdictions are below.

	Adopted SCAG Region Wide Forecasts			Adopted City of Los Angeles Forecasts		
	Year 2020	Year 2035	Year 2040	Year 2020	Year 2035	Year 2040
Population	19,663,000	22,091,000	22,138,800	4,017,000	4,442,500	4,609,400
Households	6,458,000	7,325,000	7,412,300	1,441,400	1,618,900	1,690,300
Employment	8,414,000	9,441,000	9,871,500	1,899,500	2,104,100	2,169,100

MITIGATION MEASURES

SCAG staff recommends that you review the Final Program Environmental Impact Report (Final PEIR) for the 2016 RTP/SCS for guidance, as appropriate. SCAG's Regional Council certified the Final PEIR and adopted the associated Findings of Fact and a Statement of Overriding Considerations (FOF/SOC) and Mitigation Monitoring and Reporting Program (MMRP) on April 7, 2016 (please see: <http://scagrtpscs.net/Pages/FINAL2016PEIR.aspx>). The Final PEIR includes a list of project-level performance standards-based mitigation measures that may be considered for adoption and implementation by lead, responsible, or trustee agencies in the region, as applicable and feasible. Project-level mitigation measures are within responsibility, authority, and/or jurisdiction of project-implementing agency or other public agency serving as lead agency under CEQA in subsequent project- and site- specific design, CEQA review, and decision-making processes, to meet the performance standards for each of the CEQA resource categories.

From: Lijin Sun <LSun@aqmd.gov>

Sent: Wednesday, May 01, 2019 7:13 AM

To: QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>

Subject: South Coast AQMD Staff NOP Comments for the Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project

Dear Ms. Quintanilla,

Attached are South Coast AQMD staff's comments on the Notice of Preparation of an Environmental Impact Report for the Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project (South Coast AQMD Control Number: LAC190404-01). The original, electronically signed letter will be forwarded to your attention by regular USPS mail. Please contact me if you have any questions regarding these comments.

Thank you,

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765

Direct: (909) 396-3308

Fax: (909) 396-3324

Please note that the SCAQMD is closed on Mondays.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA USPS AND E-MAIL:

May 1, 2019

EQuintanilla@lawa.org

Evelyn Quintanilla, Chief of Airport Planning II
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

Notice of Preparation of an Environmental Impact Report for the Proposed Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. South Coast AQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the Proposed Project that should be included in the Environmental Impact Report (EIR). Please send South Coast AQMD a copy of the EIR upon its completion. Note that copies of the EIR that are submitted to the State Clearinghouse are not forwarded to South Coast AQMD. Please forward a copy of the EIR directly to South Coast AQMD at the address shown in the letterhead. **In addition, please send with the EIR all appendices or technical documents related to the air quality, health risk, and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files¹. These include emission calculation spreadsheets and modeling input and output files (not PDF files). Without all files and supporting documentation, South Coast AQMD staff will be unable to complete our review of the air quality analyses in a timely manner. Any delays in providing all supporting documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

South Coast AQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. South Coast AQMD staff recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analyses. Copies of the Handbook are available from the South Coast AQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on South Coast AQMD's website at: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). South Coast AQMD staff also recommends that the Lead Agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: www.caleemod.com.

On March 3, 2017, the South Coast AQMD's Governing Board adopted the 2016 Air Quality Management Plan (2016 AQMP), which was later approved by the California Air Resources Board on

¹ Pursuant to the CEQA Guidelines Section 15174, the information contained in an EIR shall include summarized technical data, maps, plot plans, diagrams, and similar relevant information sufficient to permit full assessment of significant environmental impacts by reviewing agencies and members of the public. Placement of highly technical and specialized analysis and data in the body of an EIR should be avoided through inclusion of supporting information and analyses as appendices to the main body of the EIR. Appendices to the EIR may be prepared in volumes separate from the basic EIR document, but shall be readily available for public examination and shall be submitted to all clearinghouses which assist in public review.

March 23, 2017. Built upon the progress in implementing the 2007 and 2012 AQMPs, the 2016 AQMP provides a regional perspective on air quality and the challenges facing the South Coast Air Basin. The most significant air quality challenge in the Basin is to achieve an additional 45 percent reduction in nitrogen oxide (NO_x) emissions in 2023 and an additional 55 percent NO_x reduction beyond 2031 levels for ozone attainment. The 2016 AQMP is available on South Coast AQMD's website at: <http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan>.

South Coast AQMD staff recognizes that there are many factors Lead Agencies must consider when making local planning and land use decisions. To facilitate stronger collaboration between Lead Agencies and South Coast AQMD to reduce community exposure to source-specific and cumulative air pollution impacts, South Coast AQMD adopted the Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning in 2005. This Guidance Document provides suggested policies that local governments can use in their General Plans or through local planning to prevent or reduce potential air pollution impacts and protect public health. South Coast AQMD staff recommends that the Lead Agency review this Guidance Document as a tool when making local planning and land use decisions. This Guidance Document is available on South Coast AQMD's website at: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf>. Additional guidance on siting incompatible land uses (such as placing homes near freeways or other polluting sources) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Health Perspective*, which can be found at: <http://www.arb.ca.gov/ch/handbook.pdf>. Guidance² on strategies to reduce air pollution exposure near high-volume roadways can be found at: https://www.arb.ca.gov/ch/rd_technical_advisory_final.PDF.

South Coast AQMD has also developed both regional and localized air quality significance thresholds. South Coast AQMD staff requests that the Lead Agency compare the emissions to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>. In addition to analyzing regional air quality impacts, South Coast AQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the Proposed Project, it is recommended that the Lead Agency perform a localized analysis by either using the LSTs developed by South Coast AQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

When specific development is reasonably foreseeable as result of the goals, policies, and guidelines in the Proposed Project, the Lead Agency should identify any potential adverse air quality impacts and sources of air pollution that could occur using its best efforts to find out and a good-faith effort at full disclosure in the EIR. The degree of specificity will correspond to the degree of specificity involved in the underlying activity which is described in the EIR (CEQA Guidelines Section 15146). When quantifying air quality emissions, emissions from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air

² In April 2017, CARB published a technical advisory, *Strategies to Reduce Air Pollution Exposure Near High-Volume Roadways: Technical Advisory*, to supplement CARB's *Air Quality and Land Use Handbook: A Community Health Perspective*. This technical advisory is intended to provide information on strategies to reduce exposures to traffic emissions near high-volume roadways to assist land use planning and decision-making in order to protect public health and promote equity and environmental justice. The technical advisory is available at: <https://www.arb.ca.gov/ch/landuse.htm>.

quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, such as sources that generate or attract vehicular trips, should be included in the analysis. Furthermore, for phased projects where there will be an overlap between construction and operation, the emissions from the overlapping construction and operational activities should be combined and compared to South Coast AQMD's regional air quality CEQA *operational* thresholds to determine the level of significance.

If the Proposed Project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the Lead Agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

If the Proposed Project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines Section 15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the Proposed Project, including:

- Chapter 11 "Mitigating the Impact of a Project" of South Coast AQMD's *CEQA Air Quality Handbook*
- South Coast AQMD's CEQA web pages available here: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>
- South Coast AQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions and Rule 1403 – Asbestos Emissions from Demolition/Renovation Activities
- California Air Pollution Control Officers Association's (CAPCOA) *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

Alternatives

If the Proposed Project generates significant adverse air quality impacts, CEQA requires the consideration and discussion of alternatives to the project or its location which are capable of avoiding or substantially lessening any of the significant effects of the project. The discussion of a reasonable range of potentially feasible alternatives, including a "no project" alternative, is intended to foster informed decision-making and public participation. Pursuant to CEQA Guidelines Section 15126.6(d), the EIR shall include sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Proposed Project.

General Conformity Review Request and Determination

The Clean Air Act requires that federal agencies and public and private entities that receive approvals or funding from federal agencies such as airports and seaports undergo a General Conformity review and determination process in order to demonstrate that emissions from a proposed federal action will not interfere with a state or tribal implementation plan (SIP/TIP) for an area that has been designated by the

United States Environmental Protection Agency (U.S. EPA) as a nonattainment or maintenance area for a National Ambient Air Quality Standard (NAAQS). The conformity determination process is intended to demonstrate that a proposed federal action will not: (1) cause or contribute to new violations of a NAAQS; (2) interfere with provisions in the applicable SIP for maintenance of any NAAQS; (3) increase the frequency or severity of existing violations of any standard; or (4) delay the timely attainment of any standard³.

The South Coast Air Basin (Basin) is designated as extreme non-attainment for ozone and serious non-attainment for PM_{2.5}. To streamline the review process and to facilitate conformity determinations for projects in the Basin, two separate VOC and NO_x general conformity budgets were established in the Final 2012 Air Quality Management Plan (AQMP): 1 tons per day (tpd) of NO_x and 0.2 tpd of VOC were set aside for this purpose every year, starting in 2013 until 2030. South Coast AQMD has set up a tracking system for projects requiring conformity determinations on a first-come-first-serve basis, whereby the project emissions are debited from the applicable set aside accounts until they are depleted. Any questions related to the South Coast AQMD General Conformity review process and determination can be directed to Dr. Sang-Mi Lee, Program Supervisor, at slee@aqmd.gov.

Permits

If implementation of the Proposed Project requires a permit from South Coast AQMD, South Coast AQMD should be identified as a Responsible Agency for the Proposed Project in the EIR (CEQA Guidelines Section 15381). For more information on permits, please visit South Coast AQMD's webpage at: <http://www.aqmd.gov/home/permits>. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385.

Data Sources

South Coast AQMD rules and relevant air quality reports and data are available by calling the South Coast AQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the South Coast AQMD's webpage (<http://www.aqmd.gov>).

South Coast AQMD staff is available to work with the Lead Agency to ensure that project air quality impacts are accurately evaluated and mitigated where feasible. Please contact me at lsun@aqmg.gov, should you have any questions.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

LS

LAC190404-01
Control Number

³ United States Environmental Protection Agency. *General Conformity*. Accessed at: <https://www.epa.gov/general-conformity/what-general-conformity>.

From: [David H. Weibel](#)
To: [QUINTANILLA, EVELYN Y.](#)
Cc: [Osa L. Wolff](#); [Joseph D. Petta](#)
Subject: LAX Airfield/Terminal Modernization Project - Preparation of DEIR
Date: Friday, May 03, 2019 12:52:05 PM
Attachments: [image001.png](#)
[Ltr to E. Quintanilla-LAX re ATMP NOP comments - 5-3-19.PDF](#)

Ms. Quintanilla,

Attached is a letter containing comments on behalf of the City of El Segundo regarding the referenced project. A hard copy is concurrently being sent via Federal Express. Please let me know if you have any difficulty accessing the attachment.

Thank you,

David Weibel
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May 3, 2019

Via E-Mail and Federal Express

Evelyn Quintanilla
Chief of Airport Planning II
Los Angeles World Airports
1 World Way
Los Angeles, CA 90045
E-Mail: equintanilla@lawa.org

**Re: LAX Airfield & Terminal Modernization Project Notice of
Preparation of Draft Environmental Impact Report**

Dear Ms. Quintanilla:

On behalf of the City of El Segundo, thank you for the opportunity to review the Notice of Preparation (“NOP”) for the LAX Airfield & Terminal Modernization Project (“ATMP” or “Project”). We look forward to taking part in LAWA’s continuing efforts to ensure that the impacts of LAX are minimized and that any burdens that cannot be avoided are shared equitably among airport neighbors. El Segundo appreciates that LAWA has, thus far, been receptive to discussion regarding the scope of the Project. In order to fully address the City’s concerns, the draft environmental impact report (“DEIR”) must analyze the full scope of the Project’s environmental impacts, including the growth-induced impacts of adding new passenger terminals and gates.

As LAWA is aware, El Segundo has a number of longstanding concerns related to LAX, including noise, transportation, and air quality impacts. El Segundo is particularly concerned with the sheer magnitude of this Project. The NOP indicates that the ATMP will add a new Terminal 9 and a new Concourse 0, together containing up to twenty-nine new “contact” gates for passenger loading. Notice of Preparation (“NOP”) at 5, 7 fn. 11. These new facilities would create substantial noise, transportation, and air pollution impacts affecting El Segundo residents, who already deal with the impacts from one of the busiest airports in the world. The NOP also includes a variety of safety and “efficiency” improvements on the north and south airfields, including lengthened and

Evelyn Quintanilla
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Page 2

reconfigured taxiways. *Id.* at 3, 8. Despite these airfield improvements, the Project does not provide for the lengthening of any north airfield runways or further separate the current runways on the north side. Thus, the Project would exacerbate the existing operations imbalance between the north and south airfields, which places the impacts of the bulk of operations—involving the largest, heaviest, noisiest, and dirtiest aircraft—on El Segundo’s residents, thereby sparing City of Los Angeles residents such impacts.

The NOP also calls for major roadway demolition and reconstruction, including a consolidation of eastern access to the Central Terminal Area (“CTA”) from Century Boulevard, and an “option” to provide direct vehicle access to the proposed Terminal 9 curbside area from Sepulveda Boulevard. *Id.* at 9-10. Considered together with ongoing construction from other current and future LAX projects, the ATMP would subject residents of El Segundo and nearby communities to nearly a decade of intense construction activity. In addition, the expansion will exacerbate a growing problem of travelers and LAX workers using and parking on El Segundo streets.

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 DEIR.

Project Description and Effect on Passenger Operations

El Segundo urges LAWA to describe the Project and its environmental setting completely and accurately in the DEIR. “An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.” *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 727. El Segundo is concerned that the DEIR could fail to sufficiently analyze the Project’s potential impacts due to an incomplete project description.

For instance, the Project’s “enabling components” include demolition of several facilities, including nine aircraft parking spots at the West Remote Gates and the entire American Eagle (“AE”) commuter flight facility. NOP at 4, 8. The NOP explains that the Project will “trade” remote gates on the western edge of the airport,¹ and at the AE

¹ The NOP also states that the Project would remove passenger holding areas for West Remote Gates #228, #229, #230, and #231. NOP at 4; *see also* Figure 6. El Segundo is not familiar with this gate numbering at the West Remotes; at the last Stipulated Settlement gate count in 2017, the highest-numbered gate was #219. The DEIR should explain the reason for what appears to be a renumbering of the West Remotes.

facility, for active gates in or around the CTA and the Midfield Satellite Concourse (“MSC”). *See, e.g., id.* at 8 fn. 13. In addition to describing the removal of these and all other enabling components, the DEIR must clearly state where and when facilities slated for demolition will be rebuilt or relocated. If any of these facilities will be permanently removed, then the EIR must state this and explain how any new and/or remaining facilities will accommodate capacity served by those planned for removal. Failure to analyze the impacts of the removal, relocation, and/or substitution of these facilities would run afoul of the California Environmental Quality Act’s (“CEQA”) prohibition on project segmentation.

Furthermore, by adding two new terminals with up to 29 passenger gates, together with numerous airfield “efficiency” improvements, the Project will remove existing operational constraints, including but not limited to the current “terminal linear frontage.” The Project will enable LAX to accommodate far more passenger flight operations than have ever been analyzed in prior LAWA environmental documents. For example, the NOP states that the proposed new West Flow exits from Runway 6L/24R “would provide operational flexibility and redundancy when exits are occupied during peak arrival or departure periods.” *Id.* at 5. The DEIR must state how many more aircraft these and other Project elements would accommodate at peak times, and analyze the impacts of the increase in airfield operations.

Unless the Project is fundamentally redesigned (e.g., by removal of Terminal 9) or incorporates substantial mitigation, it will lead to major increases in vehicle miles traveled, air pollution, and noise impacts on surrounding communities including El Segundo. Under CEQA, the DEIR must address the Project’s substantial contribution to future growth in passenger traffic at LAX and the resulting impacts of such growth on surrounding communities.

Runway Imbalance

Existing LAX operations could be, but are not balanced between the north and south airfield. Rather, the south airfield, which borders El Segundo, is used for more cargo flights, flights by large (“heavy”) aircraft, and international aircraft operations. This lack of airfield balance results in an unequal share of LAX’s undesirable noise, air quality, and other impacts being placed on El Segundo’s residents. The 2004 LAX Master Plan and the 2013 Specific Plan Amendment Study (“SPAS”) addressed this lack of balance by proposing improvements to increase capacity on the north airfield. Yet the Project would add up to 18 aircraft gates (up to 12 “wide-body” aircraft gates) directly adjacent to the south airfield and El Segundo. The new north airfield concourse, on the

other hand, would add just 9 new narrow-body gates to be used by Southwest for its fleet of smaller planes used primarily for short-haul, domestic flights. The DEIR must carefully consider the extent to which the Project, and any alternatives, would address the longstanding need for balance between the north and south airfields.

The NOP also states that “acute-angle exit taxiway geometry” for proposed new exits from Runway 6L/24R would “better utilize the space available for large aircraft holding between the north airfield runways to accommodate large aircraft.” NOP at 4, 5. In addition to improving sight-lines, the exits would “enhance efficiency within the north airfield.” *Id.* at 85. The DEIR should clearly explain the new runway exits’ effect on the runway imbalance, and fully analyze the associated noise, air quality, and other impacts of any change in airfield operations resulting from these efficiency improvements.

Given the Project’s potential to significantly exacerbate the existing runway imbalance, El Segundo also requests that LAWA provide detailed disclosure of past, current and possible future runway use patterns by aircraft. This analysis should disclose how runway usage is impacted by gate location, aircraft type, airline time of day, and other factors. LAWA’s ongoing quarterly noise monitoring is lacking this important information. The DEIR must evaluate how relocation/placement of aircraft gates at the airport as part of the Project would impact runway usage and, in turn, community noise impacts.

El Segundo also separately requests that LAWA conduct an updated review of compliance with the preferential runway use policy. El Segundo believes that multiple flights, including the noisiest cargo operations, take off from the south “outboard” runway each day, thus violating LAWA’s noise abatement measure without meeting the standard for an exception to the policy. The last compliance study was completed in 2014, and should be updated to determine if additional compliance measures are necessary before new gates are built. Every violation of the preferential runway use policy contributes to serious quality-of-life issue for El Segundo residents.

Taxilane C Extension and Other South Airfield Airside Improvements

The Project would include various “improvements and modifications to existing taxiways near Concourse 0 and Terminal 9 to facilitate aircraft access to and from the gates at those facilities.” *Id.* at 1. The NOP is severely lacking in its description of these improvements, in particular the proposed “easterly extension” of Taxilane C from Taxiway C3 to Taxiway B1. *Id.* at 8. The DEIR must include a full description of the

Evelyn Quintanilla
May 3, 2019
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proposed south airfield improvements and analyze their effect on operational efficiency and the associated impacts of increased operations.

El Segundo requests that the Taxilane C extension be removed from the Project entirely. LAWA has proposed this extension previously, including as an alternative to the 2014 Runway 7L/25R Runway Safety Area (“RSA”) project. Yet LAWA has never adequately demonstrated the need for the extension or shown that any benefits would outweigh the contribution to impacts on El Segundo residents. The extension was ultimately deleted from the Revised DEIR for the RSA project (7L/25R RSA Project Revised DEIR, page 1-9) and should not be re-proposed now.

LAX Master Plan/SPAS Consistency

Given the scale of the Project and its core terminal components, El Segundo is concerned by the fact that LAWA is advancing the ATMP as a standalone project instead of as an update to the 2004 Master Plan. 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, and building new aircraft parking gates. *See generally* Master Plan Executive Summary. The adopted Master Plan alternative and the SPAS established and relied on a maximum operational capacity of 78.9 MAP. *See, e.g.*, 2012 SPAS DEIR at 2-4. LAWA cannot increase the number of gates at LAX, and include airfield improvements to enable increased operations, without comprehensively updating the Master Plan and conducting the associated environmental review. LAWA also cannot continue to rely on assumptions and mitigation from the 2004 LAX Master Plan and Master Plan EIR while also advancing the Project as entirely separate from the Master Plan.

Air Quality, Greenhouse Gas, and Noise Impacts

The NOP states that Project construction and operations could result in significant air quality, greenhouse gas (“GHG”), and noise impacts. NOP at 77-78, 90-91, 102. Thus, the DEIR must fully analyze these impacts, including impacts from the substantial increase in passenger operations the Project would enable, and provide mitigation and/or alternatives as required by CEQA.

In particular, El Segundo requests that LAWA conduct an updated Air Quality Source Apportionment Study as part of the environmental review of the Project, with technical input from El Segundo and other affected jurisdictions. The last such study was conducted in 2013, as required by the 2006 Stipulated Settlement. The air quality analysis conducted for the DEIR, and any mitigation, should carefully consider any

available findings from an updated air apportionment study. LAWA should also include increased air quality monitoring at the airport's fence lines, and within El Segundo and other jurisdictions, as part of a mitigation monitoring and reporting program ("MMRP") for any significant air quality impacts from the Project.

Transportation and Circulation Impacts

The Project will have several circulation-related components, including a design "option" to provide direct vehicle access to the proposed Terminal 9 curbside from Sepulveda Boulevard. This and other changes to existing circulation patterns, for the purpose of "easing" vehicle access to the CTA for the substantial growth in passengers who will use LAX as a result of the Project, have the potential to significantly increase vehicle miles traveled ("VMT") and associated GHGs and air quality and human health impacts in surrounding communities. *Id.* at 106-07. These impacts, and the VMT impacts of Project construction, must be fully analyzed in the DEIR.

Furthermore, the proposed and "optional" circulation components have the potential to undo the circulation benefits that were part of the Landside Access Modernization Program ("LAMP") approved by the City of Los Angeles in 2017. To the extent these LAMP circulation benefits—including relieving congestion along Sepulveda and other surface streets—are necessary to avoid and/or mitigate the transportation impacts of LAMP, the Project would violate CEQA if it impacts the LAMP-related transportation improvements. The DEIR must therefore include analyses of the Project's potential impacts on overall intersection and roadway segment congestion, including impacts to Imperial Highway and surface streets within El Segundo, such as El Segundo Boulevard.

The Project also has the potential to undo LAWA's and El Segundo's recent joint efforts to reduce off-airport parking by travelers, LAX workers, and car-share drivers. By increasing the airport's passenger capacity, the Project not only will attract more travelers to LAX but also will expand LAX vendor services, and therefore increase the use of El Segundo streets by new employees and other drivers. Unless the Project includes new parking capacity or other strategies to limit off-airport parking in El Segundo, the recent parking issues will again deteriorate.

The Project's construction timeline, combined with other concurrent and future project schedules, also has the potential to undo the recent and long-needed surface improvements to Imperial Highway. The DEIR therefore must proactively address the Project's construction impacts to Imperial Highway. The DEIR must also analyze the

potential for any construction vehicle traffic to use El Segundo's other designated truck routes or major arterial corridors. As always, El Segundo asks that truck trips for the Project avoid El Segundo when possible.

Construction Staging

The NOP does not state where construction staging for the Project would occur. Considering El Segundo's longstanding concerns related to noise and transportation impacts generated by uses at the airport's southern edge, El Segundo urges that any proposed construction staging be located away from the City. At the very least, El Segundo expects all potential impacts from construction staging to be thoroughly analyzed and mitigated in the DEIR. The project description should also state the duration of any construction activities located near El Segundo.

Cumulative Impacts

The Project is being proposed while other airport projects are still in varying stages of development, in particular, various CTA terminal upgrades, location of a ground run-up enclosure ("GRE"), rehabilitation of runways, the Century Cargo Redevelopment, the Northside Redevelopment, and the Airport Metro Connector, among others. *Id.* at 115-18. The DEIR must identify and analyze the Project's impacts when considered with these and other past, present, and probable future development at the airport and in the surrounding area. El Segundo urges a thorough analysis of potential cumulative impacts and inclusion of meaningful alternatives and mitigation measures in the DEIR.

National Environmental Policy Act Review

Although the NOP states that the Project involves at least two approvals by the Federal Aviation Administration (*id.* at 11 fn. 17), it does not indicate whether either of those approvals would require review under the National Environmental Policy Act ("NEPA"). If the Project will require NEPA review, the NOP and DEIR should disclose this fact, and any required NEPA documents should be prepared and circulated concurrently with the CEQA documents to allow the public to better understand the full scope of the Project's impacts.

Evelyn Quintanilla
May 3, 2019
Page 8

On behalf of El Segundo, thank you for addressing the foregoing issues in the DEIR. We look forward to participating fully in the Project development process.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Joseph "Seph" Petta

1109943.3

SHUTE, MIHALY
& WEINBERGER LLP



COUNTY OF LOS ANGELES
AIRPORT LAND USE COMMISSION

May 6, 2019

Evelyn Quintanilla, Chief of Airport Planning II
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

**SUBJECT: NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT
REPORT FOR THE AIRFIELD AND TERMINAL MODERNIZATION
PROJECT AT LOS ANGELES INTERNATIONAL AIRPORT**

Thank you for the opportunity to comment on the Notice of Preparation of an EIR for the Airfield and Terminal Modernization Project (ATMP) at Los Angeles International Airport (LAX). Staff of the Los Angeles County Airport Land Use Commission (ALUC) has reviewed the Notice of Preparation and the Initial Study and has the following comments.

The Initial Study noted that under Section XI.b (Land Use and Planning), the project may have a potentially significant impact on the environment since the project may have a conflict with the land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. The explanation was that amendments to LAX Plan and zoning changes will be required to adjust the plan area boundaries to resolve the conflict, as non-airport properties would be acquired for the project. According to California Public Utilities Code (PUC), Section 21676(b), amendments to a general plan or specific plan, or the adoption or approval of a zoning ordinance or building regulation within the planning boundary established by the Airport Land Use Commission (ALUC) shall be submitted to ALUC for review. Pursuant to Section 21675, the local agency shall first refer the proposed action to the ALUC for a consistency determination with the adopted Los Angeles County Airport Land Use Plan prior to any final action taken by the local jurisdiction.

Generally, the types of potential airport impacts which the ALUC considers are: 1) Exposure to aircraft noise; 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; and 4) General concerns, especially annoyance, related to aircraft overflights. These should be explained in depth in the Land Use & Planning, Noise, and Hazards/Hazardous Materials sections of the Draft Environmental Impact Report. ALUC do not review airport improvements on existing airport property, but may review impacts to the acquired properties covered by the Plan and Zoning amendments, and may review whether the project is an expansion of the airport (per PUC Section 21664.5 for the runways) and whether the project is growth-inducing.

The timing of submission of materials for review by the ALUC should be after the City and LAWA commissions take 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.

A pre-consultation with ALUC staff is recommended before the formal submission of project materials, which can be arranged by calling (213) 974-6432 or sending an email to aluc@planning.lacounty.gov. For additional information on project submittal materials, please visit our webpage at: <http://planning.lacounty.gov/aluc>.

If you have any questions, please call Alyson Stewart of my staff at (213) 458-5513 Monday through Thursday between 7:30 a.m. and 5:30 p.m, or email her at aluc@planning.lacounty.gov.

Sincerely,

A handwritten signature in cursive script that reads "A. Bruce Durbin".

Bruce Durbin, Supervising Regional Planner
Ordinance Studies/ALUC Staff

BD:as

From: [Smartsheet Notifications](#)
To: [MARTINEZ-SIDHOM, BRENDA](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Monday, May 06, 2019 3:58:53 PM



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[Our LAX Comment Form \(Prod\)](#)

Changes since 5/6/19 3:56 PM

1 row added , 1 row changed
1 attachment added

1 row added or updated (shown in **yellow**)

Row 21

Row ID	21
Full Name	ARSAC
Company Name	Alliance for a Regional Solution to Airport Congestion
Email Address	Denny@WeLiveFree.com
Comments	
Created	05/06/19 3:56 PM
Project	ATMP

Changes made by web-form@smartsheet.com

1 attachment added

[ARSAC ATMP NOP 5-6-2019.pdf \(218k\)](#) added by web-form@smartsheet.com on Row 21: ARSAC

You are receiving this email because you are subscribed to a notification "Notification" (ID# 2565793968875396) on sheet [Our LAX Comment Form \(Prod\)](#)
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ARSAC *Alliance for a Regional Solution to Airport Congestion*
7929 Breen Ave. Los Angeles, CA 90045 (physical)
310 641-4199 WWW.RegionalSolution.org info@regionalsolution.org

May 6, 2019

Evelyn Quintanilla
Chief of Airport Planning II
Los Angeles World Airports
PO Box 92216
Los Angeles, CA 9009-2216

Sent via "Comments" on www.lawa.org/atmp

RE: Comments on Airport and Terminal Modernization Notice of Preparation (NOP)

Dear Ms. Quintanilla:

The Alliance for A Regional Solution to Airport Congestion, ARSAC, wants LAX to be safe, secure, and convenient. Southern California also needs a regional network of airports to meet the increasing aviation demands beyond LAX capacity. ARSAC endorses LAX modernization; improvements are imperative to make LAX tolerable for the travelling public even at its current operation levels. Whether the proposed improvements will provide the anticipated beneficial improvements touted is to be seen.

How will LAWA assess this NOP's program level elements when combined with the totality of the approximately \$16 billion dollars of LAX improvements when those details remain elusive as well? Reported LAMP program details, for instance, are still changing.

Threshold issues must be addressed by LAWA before a meaningful project level CA Environmental Impact Review (EIR) can be accomplished:

1. Program vs project level EIR needs to be resolved.
2. Larger meeting notification distribution needed.
3. Fails to reference a key document: 2016 ARSAC-LAWA MOU
4. Relationship of LAMP program and other modernizations not well defined.
5. Evacuation and Emergency equipment not well defined.
6. Airport capacity and limiting constraint needs to be documented.
7. Mitigations need to be defined and in place early in the process.
8. Policies to help with homeless people residing in the terminals and parking garages
9. Ensure that all future or conceivable projects are used in the environmental assessments such as CTA hotel not reported to us.

Following amplification of these broad issues will be detail questions about the NOP and process, the EIR process and approval, and specific program questions.

Threshold issues amplified:

1. This NOP includes unrelated landside and airside program elements such as ground vehicle roadway changes for a new Terminal 9 (replacing existing gates) on the south airfield, landside roadway

ARSAC Alliance for a Regional Solution to Airport Congestion

improvements for Central Terminal access, and runway and taxiway safety improvements on the north. The conceptual element descriptions for these improvements within the NOP (or in any briefing for us) are not precise enough to prepare a project level environmental review. Estimated impacts and potential mitigations are strongly dependent upon unannounced major policy decisions as LAWA has not decided which ground vehicle classes will be allowed into the Central Terminal Area and/or what the total served Millions of Annual Passengers number of air operations at LAX will be.

2. Program/Project Notification. 2004 Changes to the LA City General Plan made it the responsibility of the Westchester-Playa Del Rey Plan area to accommodate LAX. We understand that meeting notification was done at 500' but for major changes as this is should have been a minimum of 2 miles including for nearby Cities.
3. A major element of this NOP is the safety and efficiency changes of the north runway complex. Although governed in part by the 2016 ARSAC-LAWA MOU it is not listed as applicable.
4. Relationship to LAMP. The initial LAMP approval doesn't include the Terminal 9 Automated People Mover (APM) station. Many policy decisions affecting how people get into terminals remains unrefined, such as hotel and parking shuttle access to the CTA. How and when will this be accomplished? LAMP APM ridership estimates need to be established along with total access numbers. How and when will this be done and used in the EIR process?
5. Evacuation and access of emergency equipment. How will major evacuation of the terminals—CTA accessible and all others be accomplished? How does APM fit into that plan? When will evacuation plans be prepared and usable? What changes will be made for time phasing of construction?
6. When determining estimated LAX MAP for assessing needs for mitigations who, and how, is future fleet mix being determined? New technologies such as Urban Air Mobility (pilotless vehicles and drones) are being talked about within next 10 years which fits into potential build timeframe. How is LAX going to limit access? Plans for limits via conditional use permits? What will be the new LAX capacity constraint? Supersonic aircraft may make a return to the world's skies by 2028 with the Boom Overture aircraft. How will LAWA handle supersonic aircraft, especially from a noise perspective? Will it still be ground vehicle access into CTA or will it become airside? Will it be the number of gates? Gates sizes are changing as well as locations. When will an accounting of what changes are occurring in placement and size be available? What is the baseline of gate size, location, capacity? What is it changing to? How many regional jet gates are being transformed to flex gates handling Group III or larger? How is total capacity determined?
7. Mitigations need to be implemented early in the improvement cycle. How will the capacity land access limitations and airfield limitations be determined? Timing? With a long build period will a mid-completed eval at i.e. 5 or 10 years from start be created as well as a final completion? Runway and taxiway through put is critical to be built first for both safety and efficiency (which impacts noise and pollution). Will runway and taxiway improvements be completed before additional gates built? Many "enabling" projects are moving existing buildings. When will a chart be available to see where they are each being moved to? What are the plans for enclosed aircraft run up structures (hush houses) since they were to be in these new project areas? What are the plans for existing mitigations such as Flyaways? How will Century be improved to facility greater access to either CTA or ITFs? Where will new holding lots be placed for TNCs, Flyaway Buses, waiting public passenger cars, cabs?
8. LAX is not alone in having homeless people living at the airport. This is becoming a national problem as seen at Atlanta (ATL) and San Francisco (SFO). What will be done to avoid homeless people residing in the terminals? ARSAC is concerned about homeless people living in the LAX Central Terminal Area (CTA) and on other parts of LAX

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property. One LAWA staff member and one city staff member have told ARSAC board members that there are homeless people living in the CTA. Management of homeless needs to be included in the scope this EIR. Examples of reports of homelessness in airports:

Atlanta: <https://www.ajc.com/business/hartsfield-jackson-strike-contract-relocate-homeless/pyK8c7xFIBcacHj7WFaHjN/>

San Francisco: <https://www.sfchronicle.com/bayarea/article/Homeless-surge-at-SF-airport-Police-contacts-13764148.php>

ARSAC recommends that LAWA establishes a homeless task force comprised of LAX Airport Police and LAX Landside Operations to identify and help homeless people connect to services and housing as it had done very well in Manchester Square. LAWA's homeless policy is not to move homeless people off of airport and into surrounding neighborhoods, especially the Westchester Central Business District (WBCD) along Sepulveda Boulevard. When LAWA finds places at LAX where homeless people are residing, LAWA will find ways to make those places less accessible for homeless people and also post signage for homeless people on where to find resources. LAWA provides a monthly report to the Board of Airport Commissioners (BOAC) on homeless issues. The report should include success stories, problem areas, help needed and recommendations for improvement.

9. It has come to our attention that LAWA has issued an RFI as an initial step of creating a hotel in the Central Terminal Area (Parking Structure 7) which would very much impact traffic. What other projects is LAWA actively considering or has proposed that they have not disclosed in relation to this NOP? Whereas it is not within our scope to make these types of decision it is still necessary to include these ideas because they directly impact the EIR conclusions. One example of our not having visibility is the Flight Path Museum. We appreciate the importance of this 501c3 internationally appreciated museum on LAWA property and would not want to jeopardize it because projects are approved which will later prohibit alternative actions. A copy of this RFI is attached.

NOP and EIR Questions

Note: "P" references are for the NOP paragraphs

1. Figure 3 identifies the airfield and landside improvements and states: Baseline includes "all existing and approved non-ATMP projects" What are these?
2. What is the airside capacity of the north runway complex and capacity of taxiways before changes?
3. What is the airside capacity of the south runway complex capacity of taxiways before changes?
4. What is the total airfield number of gates and capacity before and after this project?
5. What date is projected for removal of the remote gates on the west end of the airport?
6. What is the vehicle capacity of the CTA before and after this project?
7. What is the anticipated vehicle count and level of service on Sepulveda before and after this project?
8. When will the number of lanes for each of the new roadways be firmed? Will there be any new gridlock locations be created in the CTA? How will traffic in the Sepulveda tunnel, an already terrible gridlock area, be improved?
9. Will a full traffic study be performed for this EIR? How will traffic be affected into the CTA? Will entry into LAX and surrounding areas remain relatively constant in relative numbers per time of day or will more traffic be pushed into local communities to force people to the intermodal transportation facilities? Any new level of service F intersections caused by LAX traffic? Any Level F intersections made even worse?
10. What is the vehicle traffic anticipated at Terminal 9?

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11. The proposed roadways seem to diminish by several lanes after passing the Intermodal Traffic Facility (ITF) West area: if drivers choose not to stop at that area, will there be enough lanes to handle the traffic: now, for the Olympics, and in the 100 MAP future?
12. As traffic approaches LAX from the north on that proposed roadway, the airport will be clearly visible to the south and west, yet the road will turn vehicles sharply to the east. How will LAWA handle the problems due to drivers reacting negatively to the “wrong way” turn?
13. As traffic approaches LAX from the south on that proposed roadway, how will LAWA handle drivers with the same negative reaction to the roadway turning them away from LAX?
14. Several of the roadways merge with traffic heading to and from the CTA. What is being done to the traffic flow to be seem less, harmonious and orderly with merging impatient, harried, drivers? What signage is being generated to allow easy movement to and from each of the new traffic areas or will people have to go all the way around the CTA to return a second time to the ITF or APM station?
15. These new roadways are intended to ease congestion and traffic flow into the CTA, while at the same time LAWA is trying to urge cars to the ITF and people to the APM.
16. If traffic is heavy how will going around the CTA or to Terminal 9 for a second time be facilitated?
17. What is the vehicle traffic anticipated near/around Terminal 9 where taxi and TNC pickups are to be made?
18. Are there any roadway intersections where service levels will decrease?
19. How will APM station be incorporated into total APM line?
20. How will luggage, disabled, elderly, and others with limited mobility be accommodated from the CTA to Terminal 9? How will transfer of passengers occur from/to Terminal 9 for connecting flights? How long will it take to the various terminals? How many connecting flight passengers are anticipated?
21. What air quality impacts are expected around the new locations of traffic?
22. How will passengers access Concourse 0? Will taxiway movements around Concourse 0 change runway takeoff or landing flow? What will be the net change? What size aircraft will be accommodated?
23. Where will the taxi and TNC holding lots be located?
24. Will a “private” passenger pickup lot still be available? Where? Size? Amenities?
25. How will people get from the Century train station to LAX?
26. Will Freeway access to LAX change? How and by how much?
27. What ground soil remediation will be required for each part of the projects?
28. How will Lincoln Blvd/Sepulveda Blvd access to LAX change? What capacity exists now and what will after implementation?
29. Regarding emergencies and evacuations: How will emergency vehicles gain access to the roadways? Will there be dedicated emergency lanes? Given the expected number of people/baby strollers/wheel chairs/bags using the escalators and elevators to go to/from the People Mover stations on top of the parking structures to/from the ground level airline check-in areas, how will emergency personnel and vehicles gain access in the event of an emergency?
30. The section of Sepulveda southbound by Concourse 0 is raised. What security will be in place to protect passengers and planes at that location?
31. How many people (with luggage, etc.) can be accommodated on the escalators/elevators at each APM station in 15 minutes? How fast can a APM station be evacuated?
32. If there is an accident/emergency of any kind, how will LAWA handle potential panic reactions?
33. In case of an emergency at APM Stations on top of the parking structures will it be possible for the escalators/elevators to be restricted to one-way travel, instead of two-way to enable evacuation of people from the stations?

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34. Will it be possible to stop the APM trains from accessing a station, if there is an emergency?
35. Will there be a communication system throughout the APM system?
36. How many places will emergency vehicles have access to the horseshoe?
37. At various places, the roadways will be elevated and close to gate areas: how will LAWA ensure the safety of people/aircraft/gates?
38. How much added noise will occur from Concourse 0 aircraft movements?
39. What projects will be completed greater than 5 years after EIR approval? For those not completed what interim environmental impacts are anticipated?
40. What is the estimated number of passengers accessing gates at each terminal before implementation? How many vehicles sized by passenger capacity are anticipated entering the CTA before and after the project and 5 years after EIR completion? How many at the three time points will use the APM?
41. P3.1.1.1.1 Taxiway D Extension West: What routes for ADG V and ADG VI aircraft will be available for aircraft to move from north-south complex? What rate of movement is possible now versus amount when project is completed?
42. Will all intersections have runway status lights? Will LAWA install Enhanced Final Approach Runway Occupancy Signals (eFAROS) on both ends of the north runways?
43. P3.1.1.1.2 Enabling Projects: Where will RON aircraft parking be moved to? What capacity now versus at 5 years versus at end of project? Where will the other maintenance facilities be moved to? Will they require west end access?
44. What power lines greater than 64kV are anticipated to be moved? Will any movements be done in the landside or areas outside of LAX property to accommodate LAX needs?
45. P3.1.2 Enabling projects Terminal Area elements: When will the 96th street bridge into LAX be removed? When will the Park One and other buildings along Sepulveda be removed?
46. What is the current total passenger vehicle parking number of spaces? How many at buildout? Will the total passenger vehicle miles to get to the future spaces increase from present?
47. How deep will any tunnels or below grade floors be for Concourse 0. Any interference from the major drainage to Hyperion or oil/gas pipelines in area? Baggage transfer tunnels as well?
48. P 3.1.2.1.1 Concourse 0 characteristics: How will noise and pollution into community be affected by 2 new RON stations and runway 24L holding? Run up restrictions?
49. P 3.1.2.1.2 Concourse 0 enabling: Says bridge will be removed for APM. When? Will any ground contamination mediation be required? Concourse 0 site was previously used by Garrett Airesearch.
50. P3.1.2.2.1 Terminal 9 characteristics: How many commuter gates exist currently which are being replaced by the 12 ADG VI capable (or 18 ADG III) gates? How many seats at each gate will there be to support embarkments? How will this terminal differ from the 12 gate midfield north terminal?
51. P3.1.2.2.2 Terminal 9 enabling projects: Where will the RONs be moved to? Where will all the cargo facilities and support be moved?
52. P3.1.3.1 Landside Elements characteristics: How will new road “common entry point” east of Sepulveda on north side accommodate merging from other points east (or must everyone enter via Sepulveda)? On Southbound Sepulveda CTA exit will this represent an increase in cars from current? If yes, how will the Sepulveda tunnel lanes accommodate the increases? What is the timing with the roadways for T9 versus ITF? Same issue of merging traffic from east of Sepulveda like LaTijera to Airport Blvd.
53. P3.1.3.2 Landside enabling: LADWP parcel has parking, but also power distribution. Is it also being moved? Where?
54. P3.1.4 Utilities: Is there a change in water drainage such as storm drains and wastewater sewers? Will this impinge on the new Crenshaw-LAX line along the eastern boundary?

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55. Environmental checklist item VIIc Geology/Soils: The ground around LAX is sand based and has a history of small sink holes occurring in ramp and taxiway areas. What is the current status of the areas? How many have historically occurred in the areas near Concourse 0 and Terminal 9 along with those other landside taxiway fixes?
56. Environmental checklist item IXa Hazardous Materials: The area for Concourse 0 used to be an engineering materials test site (Garrett Airesearch) before it was used as Park One. I understand that the land was contaminated and just paved over since it was used as parking. Will the new use require mitigation?
57. Environmental checklist item Xe:Water Quality/groundwater management: The City announced massive increase in capacity at Hyperion water processing. Is this project in any way hindering the restoration of the processed water back to the City areas from which it originally flowed? Is new water pumping in large pipes underground?
58. Environmental checklist item XIII Noise: Concourse 0 is closer to homes just north of Lot C. If operations are 24/7 will it increase noise especially at night? What about runups?
59. Environmental checklist item XVIIId Transportation emergency access: With increased use of roadways and CTA what provision is made to facilitate emergency vehicles? How will evacuation and security controls be modified to accommodate the expanded landside?
60. Environmental checklist item XXIb Mandatory Findings due to cumulative: How extensive is the traffic study to look at intersections where additional traffic is driven to areas so that the new “better” roadways around LAX are utilized?

Neighborhood Protection Mitigations

1. Neighborhood protection 1- LAVA sets up a parking lot on LAVA owned land for off duty busses, shuttles, taxis, limos, TNC's so that they do not park in the Westchester Central Business District or in surrounding neighborhoods. The off duty parking lot should have public restrooms and a convenience store or vending machines. Perhaps a shuttle bus to the Westchester Central Business District, not necessarily operated by LAVA?
2. Neighborhood Protection 2- Signage to and from LAX should be oriented to direct traffic towards Century Boulevard to the extent possible.
3. Neighborhood Protection 3- FlyAway busses shall be prohibited on Sepulveda between Centinela to the north and Westchester Parkway to the south between the hours of 11:00pm and 6:00am.
4. Neighborhood Protection 4- Construction of a fully enclosed aircraft engine run enclosure, also known as a Hush House. Examples include Tokyo Narita Airport in Japan. LAVA has not committed to a run-up location and ARSAC keeps requesting this structure to be built when commenting on EIR's.
5. Traffic mitigation and reduction- LAVA will work with airlines and Metro in promoting mass transit to and from LAX.
6. Capacity cap- No more than 153 gates to 2050. LAVA must actively work with airlines to consider increasing service at underserved or unserved airports in the region that want additional or new airline service.
7. Capacity conservation. When LAX exceeds 90 MAP, LAVA must include options in any future LAX projects that includes expansion at Palmdale Regional Airport or another existing or future regional airport to offset increased demand at LAX. LAVA should encourage airlines to consider increasing service at underserved or unserved airports in the region that want additional or new airline service.
8. Security- all TNC and other for hire ground transportation service companies at LAX must have airport badging with fingerprint criminal background check.

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9. Implement all roadway mitigations indicated by a complete traffic study of the magnitude done for SPAS.

Please contact us if you have any questions.

Sincerely,



Denny Schneider
President

denny@welivefree.com (213) 675-1817



Robert Acherman
Vice President

robertacherman@aol.com (310) 927-2127

ATTACHMENTS:

Hotel RFI

Future fleet

ENCLOSURE 1

**REQUEST FOR INFORMATION
REGARDING THE VIABILITY OF
CREATING A HOTEL AND CONFERENCE CENTER COMPLEX AT
LOS ANGELES INTERNATIONAL AIRPORT**



Release Date

March 8, 2019

Deadline for Submission of Questions/Requests for Clarification

March 29, 2019, no later than 3:00 p.m. Pacific Time

All questions and requests must be submitted in writing to development@lawa.org

Request for Information Due Date

June 14, 2019 no later than 2:00 p.m. Pacific Time

At

Los Angeles World Airports

Attn: Chief Development Office

1 World Way

Los Angeles, CA, 90045

March 8, 2019

To Whom It May Concern:

Re: **Request for Information (RFI) Regarding the Viability of Creating a Hotel and Conference Center Complex at Los Angeles International Airport (LAX)**

This letter provides notice that Los Angeles World Airports (LAWA) is evaluating the possibility of the development of a Hotel and Conference Center Complex within the Central Terminal Area (CTA). LAWA is inviting input from teams interested in presenting viable options to assist LAWA in the decision whether to move forward with this endeavor at a future date to be determined. Please understand that the timing of any such development would need to be carefully assessed by LAWA alongside other capital improvement projects currently underway, or which may be potentially considered in the future, within the CTA.

The proposed Hotel and Conference Center Complex area (Study Area) is shown on the attached map and includes the current Clifton Moore Administration Building (Admin East), the old FAA Tower, Parking Structure 7, and the Theme Building. Teams will need to assume that the project would require a gut rehabilitation of Admin East, the old FAA Tower and the interior of the Theme Building including the rehabilitation of all systems. There are also historically significant restrictions on both the Old FAA Tower and the Theme Building, which restrict the height and placement of surrounding buildings. The Study Area includes LAWA Executive offices, which as stated, would need to be either gutted and restored, or alternatively, replaced elsewhere within the Study Area in their entirety, including a Board of Airport Commission Board Room which houses audience sizes from 50-150, and would require a tie in to the Automated People Mover (APM). LAWA is also interested in accommodating into a Hotel and Conference Center concept the Flight Path Museum, if feasible. The Flight Path Museum is currently located at 6661 Imperial Highway, Los Angeles, CA.

Teams should explore the optimal facility sizing for this development based on an international airport hotel and conference center and explore the following additional facilities and amenities:

- Business Center where groups, companies and individuals can get access to modern workspaces and collaboration/conference rooms. This Business Center will provide full business support amenities
- Restaurant(s), bar(s), café/coffee shop(s), catering facilities for Hotel Conference Center and Business Center
- Grocery store and other retail facilities
- Fitness and spa facilities (with showers) that also can be available for Hotel and Conference Center guests as well as to the public for a fee

The Flight Path Museum houses a variety of exhibits showing the history of LAX, airlines, flight crew uniforms and other related exhibits. In addition, there is an entertainment space, a training room and office space. Incorporating the museum would be a desirable amenity.

This is Aviation Prime Commercial Real Estate: please articulate your business case complete with capex, opex & investment return, identifying likely required term of a commercial PPP agreement with LAWA (i.e. 20, 25 or 30 years of duration). In addition included in the analysis should be information that helps LAWA answer the following questions:

- 1) Is this a Project that can be structured to be commercially viable to a third party development partner?
- 2) Could a project like this generate enough revenue for LAWA to either a) replace its existing offices and Conference Center in another location, or b) retrofit LAWA existing administrative offices and Board Room in the same location?
- 3) How much of the Study Area would need to be dedicated to a Hotel and Conference Center concept?
- 4) How much of the Study Area should be dedicated to retail?
- 5) What number of hotel rooms are necessary to make a CTA Hotel and Conference Center at LAX commercially viable to a third party developer? Interested parties must include a hotel feasibility study to support their findings.
- 6) How could a CTA Hotel and Conference Center at LAX take advantage of the Theme Building to enhance the guest experience and/or make the project more economically viable?
- 7) Could the inclusion of the Flight Path Museum be an asset to such a development and enhance guest experience?
- 8) How long of a term would be required to make a Hotel and Conference Center project economically feasible?
- 9) What would the respondent expect the potential economic benefit to LAWA might be were it to elect to advance such a project? Interested parties should also take into consideration any potential loss of revenue from existing parking improvements which would be need to be replaced, either all or in part, in order to facilitate a design concept

Please explore and explain:

- How these new facilities will fully integrate with LAX existing and future developments
- How the hotel and convention center possibly expand and support the future competitiveness of LAX
- How vehicle movement generated by the development takes full advantage of the Automated People Mover and will not increase traffic congestion
- Phasing and logistic approach to design and construction of this development in addition to the LAWA overall CIP over the next 10 years.

Areas that are available for the Hotel and Conference Center Complex include the following:

Admin East (total including the Tower is = 2.25 Acre Site) was built in 1958 with an expansion in 1985 and has a gross square footage of 67,703 and a usable square footage of 42,795. The building currently has offices and workspaces for the LAWA Executive Team and their support staff, the City Attorney's office, the Board of Airport Commissioners and their support staff, totaling about 140 people. In addition, there are nine conference rooms of various sizes and a Board Meeting Room, which seats 150 in auditorium setting with an area in the front for the Board members, and space in the rear of the auditorium for an IT room, and other digital support. This building does not need to be retained, however a new building would need to be of a similar height to preserve the views of the Old FAA Tower and the Theme Building

Old FAA Tower, which sits on the same site as the Clifton Moore Administration Building, is currently closed due to Fire Life Safety issues. The building has 25,000 square feet of interior space and was built in 1958. The Tower is identified on the LAWA Historic Preservation Plan as being retained.

Parking Structure 7 (≈ 5.25 Acre Site) is an existing three level Public Parking Structure. A future Pedestrian Walkway from East APM Station to Terminal 7/8 must be accommodated as part of this area. This building can be demolished and would be restricted in height to the approximate height of the existing Terminal 7.

Theme Building (≈ 40k square feet of Interior Floor Area) is Designated as a City of Los Angeles - Historic Cultural Monument # 570 (Symbol of the “Jet Age”). The first floor of the Theme Building is used as LAWA office space and storage and houses the newly remodeled USO. Any future use must accommodate the USO. The area around the Theme Building bounded by World Way on both the North and South is not available for building.

More information regarding the conservation of the of the Theme Building and the Old FAA Tower can be found at https://www.lawa.org/-/media/lawa-web/tenants411/file/02-lamp_deir_appendix-v2.ashx?la=en&hash=0A2D9C49E32E0456453A9C1932DC84F2532ED586

RFI and Procurement Process:

LAWA is not obligated to move forward with any of the information presented by respondents nor is LAWA obligated to enter into any agreements. LAWA is not legally bound to respond to any submittal. LAWA may at its sole option contact teams to get clarification or additional information or invite teams to present their information.

No direct award or contract will result from this RFI. This RFI is intended for informational purposes only on LAWA’s behalf. Submitted responses will not be returned, including any drawings, concepts, approaches, diagrams, etc. Respondents to this RFI consent to LAWA incorporating any ideas or concepts into any design should LAWA move forward with this project.

Submissions are for LAWA’s planning and information purposes only and do not constitute LAWA’s initiation of a procurement process. These submissions do not represent a commitment by LAWA to procure go forward with the procurement. An organization’s participation does not result in the organization being deemed a “proposer.” In addition, participation is not a prerequisite for participating in any future procurement and will not confer on an organization any preference, special designation, advantage or disadvantage whatsoever in any subsequent procurement process.

Respondents are solely responsible for any costs associated with this RFI.

RFI Schedule:

RFI Release Date	March 8, 2019
Deadline for Questions	March 29, 2019
RFI Responses due	June 14, 2019 by 2:00 pm

Communication with LAWA:

LAWA may modify the RFI or the process at any time. Responses to questions and any changes will be posted on the Los Angeles Business Assistance Virtual Network, <http://www.LABAVN.org>. All general communications regarding the RFI or requests for additional information from teams must be submitted in writing via email to development@lawa.org with the subject heading RFI for a Hotel and Conference Center at LAX. All questions and comments will be answered after the March 29, 2019 deadline.

Response Requirements:

Submissions from interested parties will be instrumental in helping inform LAWA to potential long term-strategies for optimum use of its CTA land assets. Should interested parties have alternative development ideas for highest and best use of all or a part of the Study Area, LAWA welcomes creative thoughts and input for its consideration.

LAWA seeks responses to the RFI, by no later than June 14, 2019. All responses should include, at a minimum:

- Name of the company
- Contact representative's name, email and phone number
- General background and experience in this sector; representative projects
- High level summary of the analysis of the viability of a project that addresses the information on the previous page
- Planning studies and program massing models
- Hotel Occupancy Analysis
- Alternative Development Schemes, along with Supporting Materials which help validate the Respondents concept ideas
- Renderings, images, videos or other visuals

List of Exhibits found on LABAVN.org

1. Project Study Area
2. Landside Access Modernization Program Elements Map
3. Project Study Area with LAMP alignment
4. Project Area Automated People Mover Alignment
5. Admin East Building Conditions
6. Admin East Site Development Analysis
 - 6A. Executive Summary
 - 6B. Presentation
7. LAWA Workplace Trends
 - 7A. Executive Summary
 - 7B. Presentation
8. LAX Preservation Plan

ENCLOSURE 2

ARSAC Attachment: LAX Future Commercial Airlines Fleet 2028

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Terminal	Airline	2018 Make	2018 Model	2028 Make	2028 Model	Comments
1	Southwest	Boeing	737-700	Boeing	737-MAX 7	
1	Southwest	Boeing	737-800	Boeing	737-800	
1	Southwest	Boeing	737-MAX 8	Boeing	737-MAX 8	
1	Southwest	Boeing	737-700	Boeing	737-700	
2	Aer Lingus	Airbus	A330-200	Airbus	A330-200	
2	Aeromexico	Boeing	737-700	Boeing	737-700	
2	Aeromexico	Boeing	737-800	Boeing	737-800	
2	Aeromexico	Boeing	737-MAX 7	Boeing	737-MAX 7	
2	Aeromexico	Boeing	737-MAX 8	Boeing	737-MAX 8	
2	Aeromexico	Boeing	787-8	Boeing	787-8	
2	Aeromexico	Boeing	787-9	Boeing	787-9	
2	Aeromexico Connect	Embraer	E 170	Embraer	E 170	Formerly Aerolitoral
2	Aeromexico Connect	Embraer	E 190	Embraer	E 190	Formerly Aerolitoral
2	Virgin Atlantic	Boeing	787-9	Boeing	787-9	
2	Virgin Atlantic			Boom	Overture	Supersonic aircraft
2	Volaris	Airbus	A319-200	Airbus	A319-200	
2	Volaris	Airbus	A320-200	Airbus	A320-200	
2	Volaris	Airbus	A321-200	Airbus	A321-200	
2	Volaris	Airbus	A320neo	Airbus	A320neo	
2	Volaris	Airbus	A321neo	Airbus	A321neo	
2	WestJet	Boeing	737-800	Boeing	737-800	
3	Delta	-	-	Airbus	A220-300	
3	Delta	-	-	Airbus	A321neo	
3	Delta	-	-	Airbus	A330-900neo	
3	Delta	Airbus	A220-100	Airbus	A220-100	
3	Delta	Airbus	A319-100	Airbus	A319-100	
3	Delta	Airbus	A350-900	Airbus	A350-900	
3	Delta	Boeing	717-200	Boeing	717-200	
3	Delta	Boeing	737-700	Boeing	737-700	
3	Delta	Boeing	737-800	Boeing	737-800	
3	Delta	Boeing	737-900ER	Boeing	737-900ER	
3	Delta	Boeing	757-200	Airbus	A321neo	
3	Delta	Boeing	757-300	Boeing	757-300	
3	Delta	Boeing	767-300ER	Airbus	A330-900neo	
3	Delta	Boeing	767-400ER	Boeing	767-400ER	
3	Delta	Boeing	777-200ER	Boeing	777-200ER	

ARSAC Attachment: LAX Future Commercial Airlines Fleet 2028

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3	Delta	Boeing	777-200LR	Boeing	777-200LR	
3	Delta	Boeing	MD-88	Boeing	737-900ER	
3	Delta	Boeing	MD-88	Boeing	737-900ER	
3	Delta Connection	Bombardier	CRJ-200	Bombardier	CRJ-200	
3	Delta Connection	Bombardier	CRJ-700	Bombardier	CRJ-700	
3	Delta Connection	Bombardier	CRJ-900	Bombardier	CRJ-900	
3	Delta Connection	Embraer	E 170	Embraer	E 170	
3	Delta Connection	Embraer	E 175	Embraer	E 175	
4	American	Airbus	A319-100	Airbus	A319-100	
4	American	Airbus	A320-200	Airbus	A320-200	
4	American	Airbus	A321-200	Airbus	A321-200	
4	American	Airbus	A321neo	Airbus	A321neo	
4	American	Airbus	A330-200	Airbus	A330-200	
4	American	Airbus	A330-300	Airbus	A330-300	
4	American	Boeing	737-800	Boeing	737 MAX 8	
4	American	Boeing	737 MAX 8	Boeing	737 MAX 8	
4	American	Boeing	757-200	Airbus	A321neo	
4	American	Boeing	767-300ER	Boeing	787-8	
4	American	Boeing	777-200ER	Boeing	787-9	
4	American	Boeing	777-300ER	Boeing	777-300ER	
4	American	Boeing	787-8	Boeing	787-8	
4	American	Boeing	787-9	Boeing	787-9	
4	American	Boeing	MD-82	-	-	Phased out Q2 2019
4	American	Boeing	MD-83	Airbus	A321neo	
4	American	Embraer	E 190	Airbus	A321neo	
4	American Eagle	Bombardier	CRJ-200	Bombardier	CRJ-200	
4	American Eagle	Bombardier	CRJ-700	Bombardier	CRJ-700	
4	American Eagle	Bombardier	CRJ-900	Bombardier	CRJ-900	
4	American Eagle	Embraer	ERJ-140	Embraer	ERJ-140	
4	American Eagle	Embraer	ERJ-145	Embraer	ERJ-145	
4	American Eagle	Embraer	E 175	Embraer	E 175	
5	Hawaiian Airlines	Airbus	A330-200	Boeing	787-9	
5	Sun Country	Boeing	737-800	Boeing	737-800	
6	Air Canada	Airbus	A319-100	Airbus	A319-100	
6	Air Canada	Airbus	A320-200	Boeing	737 MAX 8 & 9	
6	Air Canada	Airbus	A321-200	Airbus	A321-200	
6	Air Canada	Airbus	A330-300	Airbus	A330-300	

ARSAC Attachment: LAX Future Commercial Airlines Fleet 2028

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6	Air Canada	Boeing	737 MAX 8	Boeing	737 MAX 8	
6	Air Canada	Boeing	767-300ER	Airbus/Boeing	A330-200/787-9	
6	Air Canada	Boeing	787-9	Boeing	787-9	
6	Alaska	Airbus	A319-100	Airbus	A319-100	
6	Alaska	Airbus	A320-200	Airbus	A320-200	
6	Alaska	Airbus	A320neo	Airbus	A320neo	
6	Alaska	Airbus	A321neo	Airbus	A321neo	
6	Alaska	Boeing	737-700	Boeing	737-700	
6	Alaska	Boeing	737-800	Boeing	737-800	
6	Alaska	Boeing	737-900	Boeing	737-900	
6	Alaska	Boeing	737-900ER	Boeing	737-900ER	
6	Alaska	Boeing	737 MAX 9	Boeing	737 MAX 9	
6	Alaska	Boeing	737-700F	Boeing	737-700F	
6	Alaska	Bombardier	Dash 8 Q400	Bombardier	Dash 8 Q400	
6	Alaska	Embraer	E 175	Embraer	E 175	
6	Allegiant Air	Airbus	A319-100	Airbus	A319-100	
6	Allegiant Air	Airbus	A320-200	Airbus	A320-200	
6	Allegiant Air	Boeing	MD-88	Airbus	A320-200	MD-88 phased out 2018
6	Austrlan Airlines	Boeing	777-200ER	Boeing	777-200ER	
6	Boutique Air	Pilatus	PC-12	Pilatus	PC-12	
6	Frontier	Airbus	A319-100	Airbus	A320neo	
6	Frontier	Airbus	A320-200	Airbus	A320-200	
6	Frontier	Airbus	A320neo	Airbus	A320neo	
6	Frontier	Airbus	A321-200	Airbus	A321-200	
6	Frontier	Airbus	A321neo	Airbus	A321neo	
6	Great Lakes	Beechcraft	1900D	Beechcraft	1900D	
6	JetBlue	-	-	Airbus	A321neo	
6	JetBlue	Airbus	A320-200	Airbus	A320-200	
6	JetBlue	Airbus	A321-200	Airbus	A321-200	
6	JetBlue	Airbus	A321LR	Airbus	A321LR	
6	JetBlue	Embraer	E 190	Airbus	A220-300	
6	Mokulele Airlines	Cessna	Grand Caravan	Cessna	Grand Caravan	
6	Spirit Airlines	Airbus	A319-100	Airbus	A319-100	
6	Spirit Airlines	Airbus	A320-200	Airbus	A320-200	
6	Spirit Airlines	Airbus	A320neo	Airbus	A320neo	
6	Spirit Airlines	Airbus	A321-200	Airbus	A321-200	
7	United	-	-	Airbus	A350-900	

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7	United	Airbus	A319-100	Airbus	A319-100	
7	United	Airbus	A320-200	Airbus	A320-200	
7	United	Boeing	737-700	Boeing	737-700	
7	United	Boeing	737-800	Boeing	737-800	
7	United	Boeing	737-900ER	Boeing	737-900ER	
7	United	Boeing	737 MAX 9	Boeing	737 MAX 9	
7	United	Boeing	757-200	Boeing	757-200	
7	United	Boeing	757-300	Boeing	757-300	
7	United	Boeing	767-300ER	Boeing	767-300ER	
7	United	Boeing	767-400ER	Boeing	767-400ER	
7	United	Boeing	777-200	Airbus	A350-900	
7	United	Boeing	777-200ER	Airbus	A350-900	
7	United	Boeing	777-300ER	Boeing	777-300ER	
7	United	Boeing	787-8	Boeing	787-8	
7	United	Boeing	787-9	Boeing	787-9	
7	United	Boeing	787-10	Boeing	787-10	
7	United			Boeing	737 MAX 10	
8	United Express	Bombardier	CRJ-200	Bombardier	CRJ-200	
8	United Express	Bombardier	CRJ-550	Bombardier	CRJ-550	
8	United Express	Bombardier	CRJ-700	Bombardier	CRJ-700	
8	United Express	Bombardier	CRJ-900	Bombardier	CRJ-900	
8	United Express	Embraer	ERJ-145	Embraer	ERJ-145	
8	United Express	Embraer	E 170	Embraer	E 170	
8	United Express	Embraer	E 175	Embraer	E 175	
TBIT	Air China	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Air France	Airbus	A380-800	Airbus	A380-800	
TBIT	Air France	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Air France	Boeing	777-200ER	Boeing	777-200ER	
TBIT	Air Italy			Airbus	A330-300	
TBIT	Air New Zealand	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Air New Zealand	Boeing	787-9	Boeing	787-9	
TBIT	Air Tahiti Nui	Airbus	A340-200	Boeing	787-9	
TBIT	Alitalia	Boeing	777-200ER	Boeing	777-200ER	
TBIT	All Nippon Airways	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Asiana	Airbus	A380-800	Airbus	A380-800	
TBIT	Asiana	Airbus	A380-800	Airbus	A350-900	
TBIT	Avianca	Airbus	A320-200	Airbus	A320-200	

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TBIT	Avianca	Boeing	787-8	Boeing	787-8	
TBIT	British Airways	Airbus	A380-800	Airbus	A380-800	Not flying to LAX in 2019
TBIT	British Airways	Boeing	747-400	Boeing	777-9	747-400 phased out 2024
TBIT	British Airways	Boeing	787-9	Boeing	787-9	
TBIT	Cathay Pacific	Boeing	777-300ER	Boeing	777-300ER	
TBIT	China Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	China Eastern	Boeing	777-300ER	Boeing	777-300ER	
TBIT	China Southern	Airbus	A380-800	Airbus	A380-800	
TBIT	Copa	Boeing	737-800	Boeing	737-800	
TBIT	El Al Israel	Boeing	787-9	Boeing	787-9	
TBIT	Emirates Airline	Airbus	A380-800	Airbus	A380-800	
TBIT	Ethiopian Airlines	Boeing	787-8	Boeing	787-8	
TBIT	Etihad Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	EVA Airways	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Fiji Airways	Airbus	A330-200	Airbus	A330-200	
TBIT	Finnair	-	-	Airbus	A350-900	
TBIT	Hainan Airlines	Boeing	787-9	Boeing	787-9	
TBIT	Hong Kong Airlines	Airbus	A350-900	Airbus	A350-900	
TBIT	Iberia	Airbus	A330-200	Airbus	A330-200	
TBIT	InterJet	Airbus	A320-200	Airbus	A320-200	
TBIT	InterJet	Airbus	A321-200	Airbus	A321-200	
TBIT	InterJet	Airbus	A321neo	Airbus	A321neo	
TBIT	Japan Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Japan Airlines			Boom	Overture	Supersonic aircraft
TBIT	KLM Royal Dutch Airlines	Boeing	747-400	Boeing	787-10	747-400 phased out 2023
TBIT	KLM Royal Dutch Airlines	Boeing	777-200ER	Boeing	787-9	
TBIT	Korean Air	Airbus	A380-800	Airbus	A380-800	
TBIT	LATAM Airlines	Boeing	787-8	Boeing	787-8	
TBIT	Level Airlines	Airbus	A330-200	Airbus	A330-200	
TBIT	LOT Polish	Boeing	787-8	Boeing	787-8	
TBIT	Lufthansa Airlines	Airbus	A380-800	Airbus	A380-800	
TBIT	Lufthansa Airlines	Boeing	747-8	Boeing	747-8	
TBIT	Norwegian Air Shuttle	Boeing	787-8	Boeing	787-8	
TBIT	Philippines Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	QANTAS	Airbus	A380-800	Airbus	A380-800	
TBIT	QANTAS	Boeing	747-400	Boeing	787-9	747-400 phased out 2020
TBIT	QANTAS	Boeing	787-9	Boeing	787-9	

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TBIT	Qatar Airways	Boeing	777-200LR	Boeing	777-200LR	
TBIT	Saudia	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Scandinavian Airlines	Airbus	A330-300	Airbus	A330-300	
TBIT	Sichuan Airlines	?	?	?	?	
TBIT	Singapore Airlines	Airbus	A350-900	Airbus	A350-900	
TBIT	Singapore Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	SWISS International	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Thomas Cook	Airbus	A330-200	Airbus	A330-200	
TBIT	Turkish Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Virgin Australia	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Viva Aerobus	Airbus	A320-200	Airbus	A320-200	
TBIT	Viva Aerobus			Airbus	A320neo	
TBIT	Viva Aerobus			Airbus	A321neo	
TBIT	Volaris	Airbus	A319-100	Airbus	A319-100	
TBIT	Volaris	Airbus	A320-200	Airbus	A320-200	
TBIT	Volaris	Airbus	A320neo	Airbus	A320neo	
TBIT	Volaris	Airbus	A321-200	Airbus	A321-200	
TBIT	Volaris	Airbus	A321neo	Airbus	A321neo	
TBIT	WOW Airlines	Airbus	A330-200	-	-	Defunct 3/28/2019
TBIT	Xiamen Airlines	Boeing	787-9	Boeing	787-9	
Cargo	Aerounion	Airbus	A300F	Airbus	A300F	
Cargo	Air China Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	AirBridge Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	AirBridge Cargo	Boeing	747-8F	Boeing	747-8F	
Cargo	Aloha Air Cargo	Boeing	767-300F	Boeing	767-300F	
Cargo	Asiana Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	Cargolux	Boeing	747-400F	Boeing	747-400F	
Cargo	Cargolux	Boeing	747-8F	Boeing	747-8F	
Cargo	Cathay Pacific Cargo	Boeing	747-8F	Boeing	747-8F	
Cargo	China Airlines Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	China Cargo Airlines	Boeing	747-400F	Boeing	747-400F	
Cargo	China Cargo Airlines	Boeing	777F	Boeing	777F	
Cargo	China Southern Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	DHL Aviation	Boeing	767-200F	Boeing	767-200F	
Cargo	DHL Aviation	Boeing	767-300F	Boeing	767-300F	
Cargo	DHL Aviation	Boeing	747-400F	Boeing	747-400F	
Cargo	DHL Aviation	Boeing	747-8F	Boeing	747-8F	

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Cargo	Emirates SkyCargo	Boeing	777F	Boeing	777F	
Cargo	EVA Airways Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	EVA Airways Cargo	Boeing	777F	Boeing	777F	
Cargo	FedEx Express	Airbus	A300-600RF	Boeing	767-300F	
Cargo	FedEx Express	Airbus	A310	-	-	
Cargo	FedEx Express	Boeing	MD-10-10F	Boeing	767-300F	
Cargo	FedEx Express	Boeing	MD-10-30F	Boeing	767-300F	
Cargo	FedEx Express	Boeing	MD-11	Boeing	777F	
Cargo	Korean Air Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	Korean Air Cargo	Boeing	747-8F	Boeing	747-8F	
Cargo	Korean Air Cargo	Boeing	777F	Boeing	777F	
Cargo	LATAM Cargo Mexico	Boeing	767-300F	Boeing	767-300F	
Cargo	Lufthansa Cargo	Boeing	MD-11	Boeing	MD-11	
Cargo	Lufthansa Cargo	Boeing	777F	Boeing	777F	
Cargo	National Airlines	Boeing	747-400F	Boeing	747-400F	
Cargo	Nippon Cargo Airlines	Boeing	747-8F	Boeing	747-8F	
Cargo	QANTAS Freight	Boeing	747-400F	Boeing	747-8F	
Cargo	Qatar Airways Cargo	Boeing	747-8F	Boeing	747-8F	
Cargo	Qatar Airways Cargo	Boeing	777F	Boeing	777F	
Cargo	Singapore Airlines Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	Sky Lease Cargo	Boeing	MD-11	Boeing	MD-11	
Cargo	Sky Lease Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	UPS Air	Boeing	757-200PF	Boeing	757-200PF	
Cargo	UPS Air	Boeing	767-300F	Boeing	767-300F	
Cargo	Volga-Dneper	Antonov	An-124	Antonov	An-124	Infrequent LAX visitor
Cargo	Volga-Dneper	Antonov	An-225	Antonov	An-225	Infrequent LAX visitor
Cargo	Western Global	Boeing	747-400F	Boeing	747-400F	
Unknown	SkyWest Airlines			Mitsubishi	MRJ-90	Client not identified
Unknown	Trans States Airlines			Mitsubishi	MRJ-90	May convert to MRJ-70
Unknown	Trans States Airlines			Mitsubishi	MRJ-70	May convert to MRJ-90
VVIP	US Air Force	Boeing	747-200	Boeing	747-8	Infrequent LAX visitor
VVIP	US Air Force	Boeing	757-200	Boeing	757-200	Infrequent LAX visitor
VVIP	US Air Force	Boeing	C-17	Boeing	C-17	Infrequent LAX visitor

From: [Smartsheet Notifications](#)
To: [MARTINEZ-SIDHOM, BRENDA](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Monday, May 06, 2019 4:34:53 PM



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Changes since 5/6/19 4:32 PM

1 row added , 1 row changed
1 attachment added

1 row added or updated (shown in **yellow**)

Row 22

Row ID	22
Full Name	Douglas Carstens
Company Name	Chatten-Brown, Carstens & Minter LLP
Email Address	dpc@cbcearthlaw.com
Comments	
Created	05/06/19 4:32 PM
Project	ATMP

Changes made by web-form@smartsheet.com

1 attachment added

[Comments on Airport and Terminal Modernization Notice of Preparation.pdf](#)
(314k) added by web-form@smartsheet.com on Row 22: Douglas Carstens

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310-798-2400 Ext. 1

May 6, 2019

Evelyn Quintanilla
Chief of Airport Planning II
Los Angeles World Airports
PO Box 92216
Los Angeles, CA 9009-2216

Sent via "Comments" on www.lawa.org/atmp

RE: Comments on Airport and Terminal Modernization Notice of
Preparation

Dear Ms. Quintanilla:

Attached are the NOP comments from our client, the Alliance for a Regional Solution to Airport Congestion (ARSAC).

The Notice of Preparation (NOP) fails to reference the landmark ARSAC-LAWA Memorandum of Understanding (MOU). Many of the projects covered in the NOP are described in the MOU, including North Airfield safety improvements such as the relocation of the problem high speed runway turnoff and removal and relocation of the West Gates into the Passenger Terminal Modernization Area (PTMA) that includes the current Central Terminal Area (CTA) and the proposed Concourse 0 and Terminal 9. ARSAC questions whether LAWA considered the MOU in creating the EIR for this project. If LAWA did not consider the MOU, ARSAC seeks an explanation for the omission.

ARSAC is rightly concerned about public participation in this project. The publicity level was low, and turnout at public scoping meetings was lower than in the past. Additionally, only a 30-day comment period was provided. We request that LAWA extends the comment period by another 30 days to enable adequate public participation, after the need for such participation is further publicized.

Projects involving Los Angeles International Airport (LAX) are mega-projects. Accordingly, notification notifications to property owners must extend beyond the 500 to

Page 2

1,000-foot radius of adjoining and abutting property owners required. A radius of 2 miles better to inform those who stand to be most impacted by LAX modernization activities and operations.

In the attached letter, ARSAC proposes several reasonable mitigation measures to control capacity, mitigate traffic and improve the passenger experience at LAX. We hope that you will give these measures thoughtful and thorough consideration. ARSAC is happy to meet with you to answer any questions.

As always, I am also available to meet with you.

Sincerely,



Douglas Carstens

Enclosure

Attachment



ARSAC *Alliance for a Regional Solution to Airport Congestion*
7929 Breen Ave. Los Angeles, CA 90045 (physical)
310 641-4199 WWW.RegionalSolution.org info@regionalsolution.org

May 6, 2019

Evelyn Quintanilla
Chief of Airport Planning II
Los Angeles World Airports
PO Box 92216
Los Angeles, CA 9009-2216

Sent via "Comments" on www.lawa.org/atmp

RE: Comments on Airport and Terminal Modernization Notice of Preparation (NOP)

Dear Ms. Quintanilla:

The Alliance for A Regional Solution to Airport Congestion, ARSAC, wants LAX to be safe, secure, and convenient. Southern California also needs a regional network of airports to meet the increasing aviation demands beyond LAX capacity. ARSAC endorses LAX modernization; improvements are imperative to make LAX tolerable for the travelling public even at its current operation levels. Whether the proposed improvements will provide the anticipated beneficial improvements touted is to be seen.

How will LAWA assess this NOP's program level elements when combined with the totality of the approximately \$16 billion dollars of LAX improvements when those details remain elusive as well? Reported LAMP program details, for instance, are still changing.

Threshold issues must be addressed by LAWA before a meaningful project level CA Environmental Impact Review (EIR) can be accomplished:

1. Program vs project level EIR needs to be resolved.
2. Larger meeting notification distribution needed.
3. Fails to reference a key document: 2016 ARSAC-LAWA MOU
4. Relationship of LAMP program and other modernizations not well defined.
5. Evacuation and Emergency equipment not well defined.
6. Airport capacity and limiting constraint needs to be documented.
7. Mitigations need to be defined and in place early in the process.
8. Policies to help with homeless people residing in the terminals and parking garages
9. Ensure that all future or conceivable projects are used in the environmental assessments such as CTA hotel not reported to us.

Following amplification of these broad issues will be detail questions about the NOP and process, the EIR process and approval, and specific program questions.

Threshold issues amplified:

1. This NOP includes unrelated landside and airside program elements such as ground vehicle roadway changes for a new Terminal 9 (replacing existing gates) on the south airfield, landside roadway

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improvements for Central Terminal access, and runway and taxiway safety improvements on the north. The conceptual element descriptions for these improvements within the NOP (or in any briefing for us) are not precise enough to prepare a project level environmental review. Estimated impacts and potential mitigations are strongly dependent upon unannounced major policy decisions as LAWA has not decided which ground vehicle classes will be allowed into the Central Terminal Area and/or what the total served Millions of Annual Passengers number of air operations at LAX will be.

2. Program/Project Notification. 2004 Changes to the LA City General Plan made it the responsibility of the Westchester-Playa Del Rey Plan area to accommodate LAX. We understand that meeting notification was done at 500' but for major changes as this is should have been a minimum of 2 miles including for nearby Cities.
3. A major element of this NOP is the safety and efficiency changes of the north runway complex. Although governed in part by the 2016 ARSAC-LAWA MOU it is not listed as applicable.
4. Relationship to LAMP. The initial LAMP approval doesn't include the Terminal 9 Automated People Mover (APM) station. Many policy decisions affecting how people get into terminals remains unrefined, such as hotel and parking shuttle access to the CTA. How and when will this be accomplished? LAMP APM ridership estimates need to be established along with total access numbers. How and when will this be done and used in the EIR process?
5. Evacuation and access of emergency equipment. How will major evacuation of the terminals—CTA accessible and all others be accomplished? How does APM fit into that plan? When will evacuation plans be prepared and usable? What changes will be made for time phasing of construction?
6. When determining estimated LAX MAP for assessing needs for mitigations who, and how, is future fleet mix being determined? New technologies such as Urban Air Mobility (pilotless vehicles and drones) are being talked about within next 10 years which fits into potential build timeframe. How is LAX going to limit access? Plans for limits via conditional use permits? What will be the new LAX capacity constraint? Supersonic aircraft may make a return to the world's skies by 2028 with the Boom Overture aircraft. How will LAWA handle supersonic aircraft, especially from a noise perspective? Will it still be ground vehicle access into CTA or will it become airside? Will it be the number of gates? Gates sizes are changing as well as locations. When will an accounting of what changes are occurring in placement and size be available? What is the baseline of gate size, location, capacity? What is it changing to? How many regional jet gates are being transformed to flex gates handling Group III or larger? How is total capacity determined?
7. Mitigations need to be implemented early in the improvement cycle. How will the capacity land access limitations and airfield limitations be determined? Timing? With a long build period will a mid-completed eval at i.e. 5 or 10 years from start be created as well as a final completion? Runway and taxiway through put is critical to be built first for both safety and efficiency (which impacts noise and pollution). Will runway and taxiway improvements be completed before additional gates built? Many "enabling" projects are moving existing buildings. When will a chart be available to see where they are each being moved to? What are the plans for enclosed aircraft run up structures (hush houses) since they were to be in these new project areas? What are the plans for existing mitigations such as Flyaways? How will Century be improved to facility greater access to either CTA or ITFs? Where will new holding lots be placed for TNCs, Flyaway Buses, waiting public passenger cars, cabs?
8. LAX is not alone in having homeless people living at the airport. This is becoming a national problem as seen at Atlanta (ATL) and San Francisco (SFO). What will be done to avoid homeless people residing in the terminals? ARSAC is concerned about homeless people living in the LAX Central Terminal Area (CTA) and on other parts of LAX

ARSAC Alliance for a Regional Solution to Airport Congestion

property. One LAWA staff member and one city staff member have told ARSAC board members that there are homeless people living in the CTA. Management of homeless needs to be included in the scope this EIR. Examples of reports of homelessness in airports:

Atlanta: <https://www.ajc.com/business/hartsfield-jackson-strike-contract-relocate-homeless/pyK8c7xFIBcacHj7WFaHjN/>

San Francisco: <https://www.sfchronicle.com/bayarea/article/Homeless-surge-at-SF-airport-Police-contacts-13764148.php>

ARSAC recommends that LAWA establishes a homeless task force comprised of LAX Airport Police and LAX Landside Operations to identify and help homeless people connect to services and housing as it had done very well in Manchester Square. LAWA's homeless policy is not to move homeless people off of airport and into surrounding neighborhoods, especially the Westchester Central Business District (WBCD) along Sepulveda Boulevard. When LAWA finds places at LAX where homeless people are residing, LAWA will find ways to make those places less accessible for homeless people and also post signage for homeless people on where to find resources. LAWA provides a monthly report to the Board of Airport Commissioners (BOAC) on homeless issues. The report should include success stories, problem areas, help needed and recommendations for improvement.

9. It has come to our attention that LAWA has issued an RFI as an initial step of creating a hotel in the Central Terminal Area (Parking Structure 7) which would very much impact traffic. What other projects is LAWA actively considering or has proposed that they have not disclosed in relation to this NOP? Whereas it is not within our scope to make these types of decision it is still necessary to include these ideas because they directly impact the EIR conclusions. One example of our not having visibility is the Flight Path Museum. We appreciate the importance of this 501c3 internationally appreciated museum on LAWA property and would not want to jeopardize it because projects are approved which will later prohibit alternative actions. A copy of this RFI is attached.

NOP and EIR Questions

Note: "P" references are for the NOP paragraphs

1. Figure 3 identifies the airfield and landside improvements and states: Baseline includes "all existing and approved non-ATMP projects" What are these?
2. What is the airside capacity of the north runway complex and capacity of taxiways before changes?
3. What is the airside capacity of the south runway complex capacity of taxiways before changes?
4. What is the total airfield number of gates and capacity before and after this project?
5. What date is projected for removal of the remote gates on the west end of the airport?
6. What is the vehicle capacity of the CTA before and after this project?
7. What is the anticipated vehicle count and level of service on Sepulveda before and after this project?
8. When will the number of lanes for each of the new roadways be firmed? Will there be any new gridlock locations be created in the CTA? How will traffic in the Sepulveda tunnel, an already terrible gridlock area, be improved?
9. Will a full traffic study be performed for this EIR? How will traffic be affected into the CTA? Will entry into LAX and surrounding areas remain relatively constant in relative numbers per time of day or will more traffic be pushed into local communities to force people to the intermodal transportation facilities? Any new level of service F intersections caused by LAX traffic? Any Level F intersections made even worse?
10. What is the vehicle traffic anticipated at Terminal 9?

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11. The proposed roadways seem to diminish by several lanes after passing the Intermodal Traffic Facility (ITF) West area: if drivers choose not to stop at that area, will there be enough lanes to handle the traffic: now, for the Olympics, and in the 100 MAP future?
12. As traffic approaches LAX from the north on that proposed roadway, the airport will be clearly visible to the south and west, yet the road will turn vehicles sharply to the east. How will LAWA handle the problems due to drivers reacting negatively to the “wrong way” turn?
13. As traffic approaches LAX from the south on that proposed roadway, how will LAWA handle drivers with the same negative reaction to the roadway turning them away from LAX?
14. Several of the roadways merge with traffic heading to and from the CTA. What is being done to the traffic flow to be seem less, harmonious and orderly with merging impatient, harried, drivers? What signage is being generated to allow easy movement to and from each of the new traffic areas or will people have to go all the way around the CTA to return a second time to the ITF or APM station?
15. These new roadways are intended to ease congestion and traffic flow into the CTA, while at the same time LAWA is trying to urge cars to the ITF and people to the APM.
16. If traffic is heavy how will going around the CTA or to Terminal 9 for a second time be facilitated?
17. What is the vehicle traffic anticipated near/around Terminal 9 where taxi and TNC pickups are to be made?
18. Are there any roadway intersections where service levels will decrease?
19. How will APM station be incorporated into total APM line?
20. How will luggage, disabled, elderly, and others with limited mobility be accommodated from the CTA to Terminal 9? How will transfer of passengers occur from/to Terminal 9 for connecting flights? How long will it take to the various terminals? How many connecting flight passengers are anticipated?
21. What air quality impacts are expected around the new locations of traffic?
22. How will passengers access Concourse 0? Will taxiway movements around Concourse 0 change runway takeoff or landing flow? What will be the net change? What size aircraft will be accommodated?
23. Where will the taxi and TNC holding lots be located?
24. Will a “private” passenger pickup lot still be available? Where? Size? Amenities?
25. How will people get from the Century train station to LAX?
26. Will Freeway access to LAX change? How and by how much?
27. What ground soil remediation will be required for each part of the projects?
28. How will Lincoln Blvd/Sepulveda Blvd access to LAX change? What capacity exists now and what will after implementation?
29. Regarding emergencies and evacuations: How will emergency vehicles gain access to the roadways? Will there be dedicated emergency lanes? Given the expected number of people/baby strollers/wheel chairs/bags using the escalators and elevators to go to/from the People Mover stations on top of the parking structures to/from the ground level airline check-in areas, how will emergency personnel and vehicles gain access in the event of an emergency?
30. The section of Sepulveda southbound by Concourse 0 is raised. What security will be in place to protect passengers and planes at that location?
31. How many people (with luggage, etc.) can be accommodated on the escalators/elevators at each APM station in 15 minutes? How fast can a APM station be evacuated?
32. If there is an accident/emergency of any kind, how will LAWA handle potential panic reactions?
33. In case of an emergency at APM Stations on top of the parking structures will it be possible for the escalators/elevators to be restricted to one-way travel, instead of two-way to enable evacuation of people from the stations?

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34. Will it be possible to stop the APM trains from accessing a station, if there is an emergency?
35. Will there be a communication system throughout the APM system?
36. How many places will emergency vehicles have access to the horseshoe?
37. At various places, the roadways will be elevated and close to gate areas: how will LAWA ensure the safety of people/aircraft/gates?
38. How much added noise will occur from Concourse 0 aircraft movements?
39. What projects will be completed greater than 5 years after EIR approval? For those not completed what interim environmental impacts are anticipated?
40. What is the estimated number of passengers accessing gates at each terminal before implementation? How many vehicles sized by passenger capacity are anticipated entering the CTA before and after the project and 5 years after EIR completion? How many at the three time points will use the APM?
41. P3.1.1.1.1 Taxiway D Extension West: What routes for ADG V and ADG VI aircraft will be available for aircraft to move from north-south complex? What rate of movement is possible now versus amount when project is completed?
42. Will all intersections have runway status lights? Will LAWA install Enhanced Final Approach Runway Occupancy Signals (eFAROS) on both ends of the north runways?
43. P3.1.1.1.2 Enabling Projects: Where will RON aircraft parking be moved to? What capacity now versus at 5 years versus at end of project? Where will the other maintenance facilities be moved to? Will they require west end access?
44. What power lines greater than 64kV are anticipated to be moved? Will any movements be done in the landside or areas outside of LAX property to accommodate LAX needs?
45. P3.1.2 Enabling projects Terminal Area elements: When will the 96th street bridge into LAX be removed? When will the Park One and other buildings along Sepulveda be removed?
46. What is the current total passenger vehicle parking number of spaces? How many at buildout? Will the total passenger vehicle miles to get to the future spaces increase from present?
47. How deep will any tunnels or below grade floors be for Concourse 0. Any interference from the major drainage to Hyperion or oil/gas pipelines in area? Baggage transfer tunnels as well?
48. P 3.1.2.1.1 Concourse 0 characteristics: How will noise and pollution into community be affected by 2 new RON stations and runway 24L holding? Run up restrictions?
49. P 3.1.2.1.2 Concourse 0 enabling: Says bridge will be removed for APM. When? Will any ground contamination mediation be required? Concourse 0 site was previously used by Garrett Airesearch.
50. P3.1.2.2.1 Terminal 9 characteristics: How many commuter gates exist currently which are being replaced by the 12 ADG VI capable (or 18 ADG III) gates? How many seats at each gate will there be to support embarkments? How will this terminal differ from the 12 gate midfield north terminal?
51. P3.1.2.2.2 Terminal 9 enabling projects: Where will the RONs be moved to? Where will all the cargo facilities and support be moved?
52. P3.1.3.1 Landside Elements characteristics: How will new road “common entry point” east of Sepulveda on north side accommodate merging from other points east (or must everyone enter via Sepulveda)? On Southbound Sepulveda CTA exit will this represent an increase in cars from current? If yes, how will the Sepulveda tunnel lanes accommodate the increases? What is the timing with the roadways for T9 versus ITF? Same issue of merging traffic from east of Sepulveda like LaTijera to Airport Blvd.
53. P3.1.3.2 Landside enabling: LADWP parcel has parking, but also power distribution. Is it also being moved? Where?
54. P3.1.4 Utilities: Is there a change in water drainage such as storm drains and wastewater sewers? Will this impinge on the new Crenshaw-LAX line along the eastern boundary?

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55. Environmental checklist item VIIc Geology/Soils: The ground around LAX is sand based and has a history of small sink holes occurring in ramp and taxiway areas. What is the current status of the areas? How many have historically occurred in the areas near Concourse 0 and Terminal 9 along with those other landside taxiway fixes?
56. Environmental checklist item IXa Hazardous Materials: The area for Concourse 0 used to be an engineering materials test site (Garrett Airesearch) before it was used as Park One. I understand that the land was contaminated and just paved over since it was used as parking. Will the new use require mitigation?
57. Environmental checklist item Xe:Water Quality/groundwater management: The City announced massive increase in capacity at Hyperion water processing. Is this project in any way hindering the restoration of the processed water back to the City areas from which it originally flowed? Is new water pumping in large pipes underground?
58. Environmental checklist item XIII Noise: Concourse 0 is closer to homes just north of Lot C. If operations are 24/7 will it increase noise especially at night? What about runups?
59. Environmental checklist item XVIIId Transportation emergency access: With increased use of roadways and CTA what provision is made to facilitate emergency vehicles? How will evacuation and security controls be modified to accommodate the expanded landside?
60. Environmental checklist item XXIb Mandatory Findings due to cumulative: How extensive is the traffic study to look at intersections where additional traffic is driven to areas so that the new “better” roadways around LAX are utilized?

Neighborhood Protection Mitigations

1. Neighborhood protection 1- LAVA sets up a parking lot on LAVA owned land for off duty busses, shuttles, taxis, limos, TNC's so that they do not park in the Westchester Central Business District or in surrounding neighborhoods. The off duty parking lot should have public restrooms and a convenience store or vending machines. Perhaps a shuttle bus to the Westchester Central Business District, not necessarily operated by LAVA?
2. Neighborhood Protection 2- Signage to and from LAX should be oriented to direct traffic towards Century Boulevard to the extent possible.
3. Neighborhood Protection 3- FlyAway busses shall be prohibited on Sepulveda between Centinela to the north and Westchester Parkway to the south between the hours of 11:00pm and 6:00am.
4. Neighborhood Protection 4- Construction of a fully enclosed aircraft engine run enclosure, also known as a Hush House. Examples include Tokyo Narita Airport in Japan. LAVA has not committed to a run-up location and ARSAC keeps requesting this structure to be built when commenting on EIR's.
5. Traffic mitigation and reduction- LAVA will work with airlines and Metro in promoting mass transit to and from LAX.
6. Capacity cap- No more than 153 gates to 2050. LAVA must actively work with airlines to consider increasing service at underserved or unserved airports in the region that want additional or new airline service.
7. Capacity conservation. When LAX exceeds 90 MAP, LAVA must include options in any future LAX projects that includes expansion at Palmdale Regional Airport or another existing or future regional airport to offset increased demand at LAX. LAVA should encourage airlines to consider increasing service at underserved or unserved airports in the region that want additional or new airline service.
8. Security- all TNC and other for hire ground transportation service companies at LAX must have airport badging with fingerprint criminal background check.

ARSAC Alliance for a Regional Solution to Airport Congestion

9. Implement all roadway mitigations indicated by a complete traffic study of the magnitude done for SPAS.

Please contact us if you have any questions.

Sincerely,



Denny Schneider
President

denny@welivefree.com (213) 675-1817



Robert Acherman
Vice President

robertacherman@aol.com (310) 927-2127

ATTACHMENTS:

Hotel RFI

Future fleet

ENCLOSURE 1

**REQUEST FOR INFORMATION
REGARDING THE VIABILITY OF
CREATING A HOTEL AND CONFERENCE CENTER COMPLEX AT
LOS ANGELES INTERNATIONAL AIRPORT**



Release Date

March 8, 2019

Deadline for Submission of Questions/Requests for Clarification

March 29, 2019, no later than 3:00 p.m. Pacific Time

All questions and requests must be submitted in writing to development@lawa.org

Request for Information Due Date

June 14, 2019 no later than 2:00 p.m. Pacific Time

At

Los Angeles World Airports

Attn: Chief Development Office

1 World Way

Los Angeles, CA, 90045

March 8, 2019

To Whom It May Concern:

Re: **Request for Information (RFI) Regarding the Viability of Creating a Hotel and Conference Center Complex at Los Angeles International Airport (LAX)**

This letter provides notice that Los Angeles World Airports (LAWA) is evaluating the possibility of the development of a Hotel and Conference Center Complex within the Central Terminal Area (CTA). LAWA is inviting input from teams interested in presenting viable options to assist LAWA in the decision whether to move forward with this endeavor at a future date to be determined. Please understand that the timing of any such development would need to be carefully assessed by LAWA alongside other capital improvement projects currently underway, or which may be potentially considered in the future, within the CTA.

The proposed Hotel and Conference Center Complex area (Study Area) is shown on the attached map and includes the current Clifton Moore Administration Building (Admin East), the old FAA Tower, Parking Structure 7, and the Theme Building. Teams will need to assume that the project would require a gut rehabilitation of Admin East, the old FAA Tower and the interior of the Theme Building including the rehabilitation of all systems. There are also historically significant restrictions on both the Old FAA Tower and the Theme Building, which restrict the height and placement of surrounding buildings. The Study Area includes LAWA Executive offices, which as stated, would need to be either gutted and restored, or alternatively, replaced elsewhere within the Study Area in their entirety, including a Board of Airport Commission Board Room which houses audience sizes from 50-150, and would require a tie in to the Automated People Mover (APM). LAWA is also interested in accommodating into a Hotel and Conference Center concept the Flight Path Museum, if feasible. The Flight Path Museum is currently located at 6661 Imperial Highway, Los Angeles, CA.

Teams should explore the optimal facility sizing for this development based on an international airport hotel and conference center and explore the following additional facilities and amenities:

- Business Center where groups, companies and individuals can get access to modern workspaces and collaboration/conference rooms. This Business Center will provide full business support amenities
- Restaurant(s), bar(s), café/coffee shop(s), catering facilities for Hotel Conference Center and Business Center
- Grocery store and other retail facilities
- Fitness and spa facilities (with showers) that also can be available for Hotel and Conference Center guests as well as to the public for a fee

The Flight Path Museum houses a variety of exhibits showing the history of LAX, airlines, flight crew uniforms and other related exhibits. In addition, there is an entertainment space, a training room and office space. Incorporating the museum would be a desirable amenity.

This is Aviation Prime Commercial Real Estate: please articulate your business case complete with capex, opex & investment return, identifying likely required term of a commercial PPP agreement with LAWA (i.e. 20, 25 or 30 years of duration). In addition included in the analysis should be information that helps LAWA answer the following questions:

- 1) Is this a Project that can be structured to be commercially viable to a third party development partner?
- 2) Could a project like this generate enough revenue for LAWA to either a) replace its existing offices and Conference Center in another location, or b) retrofit LAWA existing administrative offices and Board Room in the same location?
- 3) How much of the Study Area would need to be dedicated to a Hotel and Conference Center concept?
- 4) How much of the Study Area should be dedicated to retail?
- 5) What number of hotel rooms are necessary to make a CTA Hotel and Conference Center at LAX commercially viable to a third party developer? Interested parties must include a hotel feasibility study to support their findings.
- 6) How could a CTA Hotel and Conference Center at LAX take advantage of the Theme Building to enhance the guest experience and/or make the project more economically viable?
- 7) Could the inclusion of the Flight Path Museum be an asset to such a development and enhance guest experience?
- 8) How long of a term would be required to make a Hotel and Conference Center project economically feasible?
- 9) What would the respondent expect the potential economic benefit to LAWA might be were it to elect to advance such a project? Interested parties should also take into consideration any potential loss of revenue from existing parking improvements which would be need to be replaced, either all or in part, in order to facilitate a design concept

Please explore and explain:

- How these new facilities will fully integrate with LAX existing and future developments
- How the hotel and convention center possibly expand and support the future competitiveness of LAX
- How vehicle movement generated by the development takes full advantage of the Automated People Mover and will not increase traffic congestion
- Phasing and logistic approach to design and construction of this development in addition to the LAWA overall CIP over the next 10 years.

Areas that are available for the Hotel and Conference Center Complex include the following:

Admin East (total including the Tower is = 2.25 Acre Site) was built in 1958 with an expansion in 1985 and has a gross square footage of 67,703 and a usable square footage of 42,795. The building currently has offices and workspaces for the LAWA Executive Team and their support staff, the City Attorney's office, the Board of Airport Commissioners and their support staff, totaling about 140 people. In addition, there are nine conference rooms of various sizes and a Board Meeting Room, which seats 150 in auditorium setting with an area in the front for the Board members, and space in the rear of the auditorium for an IT room, and other digital support. This building does not need to be retained, however a new building would need to be of a similar height to preserve the views of the Old FAA Tower and the Theme Building

Old FAA Tower, which sits on the same site as the Clifton Moore Administration Building, is currently closed due to Fire Life Safety issues. The building has 25,000 square feet of interior space and was built in 1958. The Tower is identified on the LAWA Historic Preservation Plan as being retained.

Parking Structure 7 (≈ 5.25 Acre Site) is an existing three level Public Parking Structure. A future Pedestrian Walkway from East APM Station to Terminal 7/8 must be accommodated as part of this area. This building can be demolished and would be restricted in height to the approximate height of the existing Terminal 7.

Theme Building (≈ 40k square feet of Interior Floor Area) is Designated as a City of Los Angeles - Historic Cultural Monument # 570 (Symbol of the “Jet Age”). The first floor of the Theme Building is used as LAWA office space and storage and houses the newly remodeled USO. Any future use must accommodate the USO. The area around the Theme Building bounded by World Way on both the North and South is not available for building.

More information regarding the conservation of the of the Theme Building and the Old FAA Tower can be found at https://www.lawa.org/-/media/lawa-web/tenants411/file/02-lamp_deir_appendix-v2.ashx?la=en&hash=0A2D9C49E32E0456453A9C1932DC84F2532ED586

RFI and Procurement Process:

LAWA is not obligated to move forward with any of the information presented by respondents nor is LAWA obligated to enter into any agreements. LAWA is not legally bound to respond to any submittal. LAWA may at its sole option contact teams to get clarification or additional information or invite teams to present their information.

No direct award or contract will result from this RFI. This RFI is intended for informational purposes only on LAWA’s behalf. Submitted responses will not be returned, including any drawings, concepts, approaches, diagrams, etc. Respondents to this RFI consent to LAWA incorporating any ideas or concepts into any design should LAWA move forward with this project.

Submissions are for LAWA’s planning and information purposes only and do not constitute LAWA’s initiation of a procurement process. These submissions do not represent a commitment by LAWA to procure go forward with the procurement. An organization’s participation does not result in the organization being deemed a “proposer.” In addition, participation is not a prerequisite for participating in any future procurement and will not confer on an organization any preference, special designation, advantage or disadvantage whatsoever in any subsequent procurement process.

Respondents are solely responsible for any costs associated with this RFI.

RFI Schedule:

RFI Release Date	March 8, 2019
Deadline for Questions	March 29, 2019
RFI Responses due	June 14, 2019 by 2:00 pm

Communication with LAWA:

LAWA may modify the RFI or the process at any time. Responses to questions and any changes will be posted on the Los Angeles Business Assistance Virtual Network, <http://www.LABAVN.org>. All general communications regarding the RFI or requests for additional information from teams must be submitted in writing via email to development@lawa.org with the subject heading RFI for a Hotel and Conference Center at LAX. All questions and comments will be answered after the March 29, 2019 deadline.

Response Requirements:

Submissions from interested parties will be instrumental in helping inform LAWA to potential long term-strategies for optimum use of its CTA land assets. Should interested parties have alternative development ideas for highest and best use of all or a part of the Study Area, LAWA welcomes creative thoughts and input for its consideration.

LAWA seeks responses to the RFI, by no later than June 14, 2019. All responses should include, at a minimum:

- Name of the company
- Contact representative's name, email and phone number
- General background and experience in this sector; representative projects
- High level summary of the analysis of the viability of a project that addresses the information on the previous page
- Planning studies and program massing models
- Hotel Occupancy Analysis
- Alternative Development Schemes, along with Supporting Materials which help validate the Respondents concept ideas
- Renderings, images, videos or other visuals

List of Exhibits found on LABAVN.org

1. Project Study Area
2. Landside Access Modernization Program Elements Map
3. Project Study Area with LAMP alignment
4. Project Area Automated People Mover Alignment
5. Admin East Building Conditions
6. Admin East Site Development Analysis
 - 6A. Executive Summary
 - 6B. Presentation
7. LAWA Workplace Trends
 - 7A. Executive Summary
 - 7B. Presentation
8. LAX Preservation Plan

ENCLOSURE 2

ARSAC Attachment: LAX Future Commercial Airlines Fleet 2028

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Terminal	Airline	2018 Make	2018 Model	2028 Make	2028 Model	Comments
1	Southwest	Boeing	737-700	Boeing	737-MAX 7	
1	Southwest	Boeing	737-800	Boeing	737-800	
1	Southwest	Boeing	737-MAX 8	Boeing	737-MAX 8	
1	Southwest	Boeing	737-700	Boeing	737-700	
2	Aer Lingus	Airbus	A330-200	Airbus	A330-200	
2	Aeromexico	Boeing	737-700	Boeing	737-700	
2	Aeromexico	Boeing	737-800	Boeing	737-800	
2	Aeromexico	Boeing	737-MAX 7	Boeing	737-MAX 7	
2	Aeromexico	Boeing	737-MAX 8	Boeing	737-MAX 8	
2	Aeromexico	Boeing	787-8	Boeing	787-8	
2	Aeromexico	Boeing	787-9	Boeing	787-9	
2	Aeromexico Connect	Embraer	E 170	Embraer	E 170	Formerly Aerolitoral
2	Aeromexico Connect	Embraer	E 190	Embraer	E 190	Formerly Aerolitoral
2	Virgin Atlantic	Boeing	787-9	Boeing	787-9	
2	Virgin Atlantic			Boom	Overture	Supersonic aircraft
2	Volaris	Airbus	A319-200	Airbus	A319-200	
2	Volaris	Airbus	A320-200	Airbus	A320-200	
2	Volaris	Airbus	A321-200	Airbus	A321-200	
2	Volaris	Airbus	A320neo	Airbus	A320neo	
2	Volaris	Airbus	A321neo	Airbus	A321neo	
2	WestJet	Boeing	737-800	Boeing	737-800	
3	Delta	-	-	Airbus	A220-300	
3	Delta	-	-	Airbus	A321neo	
3	Delta	-	-	Airbus	A330-900neo	
3	Delta	Airbus	A220-100	Airbus	A220-100	
3	Delta	Airbus	A319-100	Airbus	A319-100	
3	Delta	Airbus	A350-900	Airbus	A350-900	
3	Delta	Boeing	717-200	Boeing	717-200	
3	Delta	Boeing	737-700	Boeing	737-700	
3	Delta	Boeing	737-800	Boeing	737-800	
3	Delta	Boeing	737-900ER	Boeing	737-900ER	
3	Delta	Boeing	757-200	Airbus	A321neo	
3	Delta	Boeing	757-300	Boeing	757-300	
3	Delta	Boeing	767-300ER	Airbus	A330-900neo	
3	Delta	Boeing	767-400ER	Boeing	767-400ER	
3	Delta	Boeing	777-200ER	Boeing	777-200ER	

ARSAC Attachment: LAX Future Commercial Airlines Fleet 2028

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3	Delta	Boeing	777-200LR	Boeing	777-200LR	
3	Delta	Boeing	MD-88	Boeing	737-900ER	
3	Delta	Boeing	MD-88	Boeing	737-900ER	
3	Delta Connection	Bombardier	CRJ-200	Bombardier	CRJ-200	
3	Delta Connection	Bombardier	CRJ-700	Bombardier	CRJ-700	
3	Delta Connection	Bombardier	CRJ-900	Bombardier	CRJ-900	
3	Delta Connection	Embraer	E 170	Embraer	E 170	
3	Delta Connection	Embraer	E 175	Embraer	E 175	
4	American	Airbus	A319-100	Airbus	A319-100	
4	American	Airbus	A320-200	Airbus	A320-200	
4	American	Airbus	A321-200	Airbus	A321-200	
4	American	Airbus	A321neo	Airbus	A321neo	
4	American	Airbus	A330-200	Airbus	A330-200	
4	American	Airbus	A330-300	Airbus	A330-300	
4	American	Boeing	737-800	Boeing	737 MAX 8	
4	American	Boeing	737 MAX 8	Boeing	737 MAX 8	
4	American	Boeing	757-200	Airbus	A321neo	
4	American	Boeing	767-300ER	Boeing	787-8	
4	American	Boeing	777-200ER	Boeing	787-9	
4	American	Boeing	777-300ER	Boeing	777-300ER	
4	American	Boeing	787-8	Boeing	787-8	
4	American	Boeing	787-9	Boeing	787-9	
4	American	Boeing	MD-82	-	-	Phased out Q2 2019
4	American	Boeing	MD-83	Airbus	A321neo	
4	American	Embraer	E 190	Airbus	A321neo	
4	American Eagle	Bombardier	CRJ-200	Bombardier	CRJ-200	
4	American Eagle	Bombardier	CRJ-700	Bombardier	CRJ-700	
4	American Eagle	Bombardier	CRJ-900	Bombardier	CRJ-900	
4	American Eagle	Embraer	ERJ-140	Embraer	ERJ-140	
4	American Eagle	Embraer	ERJ-145	Embraer	ERJ-145	
4	American Eagle	Embraer	E 175	Embraer	E 175	
5	Hawaiian Airlines	Airbus	A330-200	Boeing	787-9	
5	Sun Country	Boeing	737-800	Boeing	737-800	
6	Air Canada	Airbus	A319-100	Airbus	A319-100	
6	Air Canada	Airbus	A320-200	Boeing	737 MAX 8 & 9	
6	Air Canada	Airbus	A321-200	Airbus	A321-200	
6	Air Canada	Airbus	A330-300	Airbus	A330-300	

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6	Air Canada	Boeing	737 MAX 8	Boeing	737 MAX 8	
6	Air Canada	Boeing	767-300ER	Airbus/Boeing	A330-200/787-9	
6	Air Canada	Boeing	787-9	Boeing	787-9	
6	Alaska	Airbus	A319-100	Airbus	A319-100	
6	Alaska	Airbus	A320-200	Airbus	A320-200	
6	Alaska	Airbus	A320neo	Airbus	A320neo	
6	Alaska	Airbus	A321neo	Airbus	A321neo	
6	Alaska	Boeing	737-700	Boeing	737-700	
6	Alaska	Boeing	737-800	Boeing	737-800	
6	Alaska	Boeing	737-900	Boeing	737-900	
6	Alaska	Boeing	737-900ER	Boeing	737-900ER	
6	Alaska	Boeing	737 MAX 9	Boeing	737 MAX 9	
6	Alaska	Boeing	737-700F	Boeing	737-700F	
6	Alaska	Bombardier	Dash 8 Q400	Bombardier	Dash 8 Q400	
6	Alaska	Embraer	E 175	Embraer	E 175	
6	Allegiant Air	Airbus	A319-100	Airbus	A319-100	
6	Allegiant Air	Airbus	A320-200	Airbus	A320-200	
6	Allegiant Air	Boeing	MD-88	Airbus	A320-200	MD-88 phased out 2018
6	Austrlan Airlines	Boeing	777-200ER	Boeing	777-200ER	
6	Boutique Air	Pilatus	PC-12	Pilatus	PC-12	
6	Frontier	Airbus	A319-100	Airbus	A320neo	
6	Frontier	Airbus	A320-200	Airbus	A320-200	
6	Frontier	Airbus	A320neo	Airbus	A320neo	
6	Frontier	Airbus	A321-200	Airbus	A321-200	
6	Frontier	Airbus	A321neo	Airbus	A321neo	
6	Great Lakes	Beechcraft	1900D	Beechcraft	1900D	
6	JetBlue	-	-	Airbus	A321neo	
6	JetBlue	Airbus	A320-200	Airbus	A320-200	
6	JetBlue	Airbus	A321-200	Airbus	A321-200	
6	JetBlue	Airbus	A321LR	Airbus	A321LR	
6	JetBlue	Embraer	E 190	Airbus	A220-300	
6	Mokulele Airlines	Cessna	Grand Caravan	Cessna	Grand Caravan	
6	Spirit Airlines	Airbus	A319-100	Airbus	A319-100	
6	Spirit Airlines	Airbus	A320-200	Airbus	A320-200	
6	Spirit Airlines	Airbus	A320neo	Airbus	A320neo	
6	Spirit Airlines	Airbus	A321-200	Airbus	A321-200	
7	United	-	-	Airbus	A350-900	

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7	United	Airbus	A319-100	Airbus	A319-100	
7	United	Airbus	A320-200	Airbus	A320-200	
7	United	Boeing	737-700	Boeing	737-700	
7	United	Boeing	737-800	Boeing	737-800	
7	United	Boeing	737-900ER	Boeing	737-900ER	
7	United	Boeing	737 MAX 9	Boeing	737 MAX 9	
7	United	Boeing	757-200	Boeing	757-200	
7	United	Boeing	757-300	Boeing	757-300	
7	United	Boeing	767-300ER	Boeing	767-300ER	
7	United	Boeing	767-400ER	Boeing	767-400ER	
7	United	Boeing	777-200	Airbus	A350-900	
7	United	Boeing	777-200ER	Airbus	A350-900	
7	United	Boeing	777-300ER	Boeing	777-300ER	
7	United	Boeing	787-8	Boeing	787-8	
7	United	Boeing	787-9	Boeing	787-9	
7	United	Boeing	787-10	Boeing	787-10	
7	United			Boeing	737 MAX 10	
8	United Express	Bombardier	CRJ-200	Bombardier	CRJ-200	
8	United Express	Bombardier	CRJ-550	Bombardier	CRJ-550	
8	United Express	Bombardier	CRJ-700	Bombardier	CRJ-700	
8	United Express	Bombardier	CRJ-900	Bombardier	CRJ-900	
8	United Express	Embraer	ERJ-145	Embraer	ERJ-145	
8	United Express	Embraer	E 170	Embraer	E 170	
8	United Express	Embraer	E 175	Embraer	E 175	
TBIT	Air China	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Air France	Airbus	A380-800	Airbus	A380-800	
TBIT	Air France	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Air France	Boeing	777-200ER	Boeing	777-200ER	
TBIT	Air Italy			Airbus	A330-300	
TBIT	Air New Zealand	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Air New Zealand	Boeing	787-9	Boeing	787-9	
TBIT	Air Tahiti Nui	Airbus	A340-200	Boeing	787-9	
TBIT	Alitalia	Boeing	777-200ER	Boeing	777-200ER	
TBIT	All Nippon Airways	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Asiana	Airbus	A380-800	Airbus	A380-800	
TBIT	Asiana	Airbus	A380-800	Airbus	A350-900	
TBIT	Avianca	Airbus	A320-200	Airbus	A320-200	

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TBIT	Avianca	Boeing	787-8	Boeing	787-8	
TBIT	British Airways	Airbus	A380-800	Airbus	A380-800	Not flying to LAX in 2019
TBIT	British Airways	Boeing	747-400	Boeing	777-9	747-400 phased out 2024
TBIT	British Airways	Boeing	787-9	Boeing	787-9	
TBIT	Cathay Pacific	Boeing	777-300ER	Boeing	777-300ER	
TBIT	China Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	China Eastern	Boeing	777-300ER	Boeing	777-300ER	
TBIT	China Southern	Airbus	A380-800	Airbus	A380-800	
TBIT	Copa	Boeing	737-800	Boeing	737-800	
TBIT	El Al Israel	Boeing	787-9	Boeing	787-9	
TBIT	Emirates Airline	Airbus	A380-800	Airbus	A380-800	
TBIT	Ethiopian Airlines	Boeing	787-8	Boeing	787-8	
TBIT	Etihad Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	EVA Airways	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Fiji Airways	Airbus	A330-200	Airbus	A330-200	
TBIT	Finnair	-	-	Airbus	A350-900	
TBIT	Hainan Airlines	Boeing	787-9	Boeing	787-9	
TBIT	Hong Kong Airlines	Airbus	A350-900	Airbus	A350-900	
TBIT	Iberia	Airbus	A330-200	Airbus	A330-200	
TBIT	InterJet	Airbus	A320-200	Airbus	A320-200	
TBIT	InterJet	Airbus	A321-200	Airbus	A321-200	
TBIT	InterJet	Airbus	A321neo	Airbus	A321neo	
TBIT	Japan Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Japan Airlines			Boom	Overture	Supersonic aircraft
TBIT	KLM Royal Dutch Airlines	Boeing	747-400	Boeing	787-10	747-400 phased out 2023
TBIT	KLM Royal Dutch Airlines	Boeing	777-200ER	Boeing	787-9	
TBIT	Korean Air	Airbus	A380-800	Airbus	A380-800	
TBIT	LATAM Airlines	Boeing	787-8	Boeing	787-8	
TBIT	Level Airlines	Airbus	A330-200	Airbus	A330-200	
TBIT	LOT Polish	Boeing	787-8	Boeing	787-8	
TBIT	Lufthansa Airlines	Airbus	A380-800	Airbus	A380-800	
TBIT	Lufthansa Airlines	Boeing	747-8	Boeing	747-8	
TBIT	Norwegian Air Shuttle	Boeing	787-8	Boeing	787-8	
TBIT	Philippines Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	QANTAS	Airbus	A380-800	Airbus	A380-800	
TBIT	QANTAS	Boeing	747-400	Boeing	787-9	747-400 phased out 2020
TBIT	QANTAS	Boeing	787-9	Boeing	787-9	

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TBIT	Qatar Airways	Boeing	777-200LR	Boeing	777-200LR	
TBIT	Saudia	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Scandinavian Airlines	Airbus	A330-300	Airbus	A330-300	
TBIT	Sichuan Airlines	?	?	?	?	
TBIT	Singapore Airlines	Airbus	A350-900	Airbus	A350-900	
TBIT	Singapore Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	SWISS International	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Thomas Cook	Airbus	A330-200	Airbus	A330-200	
TBIT	Turkish Airlines	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Virgin Australia	Boeing	777-300ER	Boeing	777-300ER	
TBIT	Viva Aerobus	Airbus	A320-200	Airbus	A320-200	
TBIT	Viva Aerobus			Airbus	A320neo	
TBIT	Viva Aerobus			Airbus	A321neo	
TBIT	Volaris	Airbus	A319-100	Airbus	A319-100	
TBIT	Volaris	Airbus	A320-200	Airbus	A320-200	
TBIT	Volaris	Airbus	A320neo	Airbus	A320neo	
TBIT	Volaris	Airbus	A321-200	Airbus	A321-200	
TBIT	Volaris	Airbus	A321neo	Airbus	A321neo	
TBIT	WOW Airlines	Airbus	A330-200	-	-	Defunct 3/28/2019
TBIT	Xiamen Airlines	Boeing	787-9	Boeing	787-9	
Cargo	Aerounion	Airbus	A300F	Airbus	A300F	
Cargo	Air China Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	AirBridge Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	AirBridge Cargo	Boeing	747-8F	Boeing	747-8F	
Cargo	Aloha Air Cargo	Boeing	767-300F	Boeing	767-300F	
Cargo	Asiana Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	Cargolux	Boeing	747-400F	Boeing	747-400F	
Cargo	Cargolux	Boeing	747-8F	Boeing	747-8F	
Cargo	Cathay Pacific Cargo	Boeing	747-8F	Boeing	747-8F	
Cargo	China Airlines Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	China Cargo Airlines	Boeing	747-400F	Boeing	747-400F	
Cargo	China Cargo Airlines	Boeing	777F	Boeing	777F	
Cargo	China Southern Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	DHL Aviation	Boeing	767-200F	Boeing	767-200F	
Cargo	DHL Aviation	Boeing	767-300F	Boeing	767-300F	
Cargo	DHL Aviation	Boeing	747-400F	Boeing	747-400F	
Cargo	DHL Aviation	Boeing	747-8F	Boeing	747-8F	

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Cargo	Emirates SkyCargo	Boeing	777F	Boeing	777F	
Cargo	EVA Airways Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	EVA Airways Cargo	Boeing	777F	Boeing	777F	
Cargo	FedEx Express	Airbus	A300-600RF	Boeing	767-300F	
Cargo	FedEx Express	Airbus	A310	-	-	
Cargo	FedEx Express	Boeing	MD-10-10F	Boeing	767-300F	
Cargo	FedEx Express	Boeing	MD-10-30F	Boeing	767-300F	
Cargo	FedEx Express	Boeing	MD-11	Boeing	777F	
Cargo	Korean Air Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	Korean Air Cargo	Boeing	747-8F	Boeing	747-8F	
Cargo	Korean Air Cargo	Boeing	777F	Boeing	777F	
Cargo	LATAM Cargo Mexico	Boeing	767-300F	Boeing	767-300F	
Cargo	Lufthansa Cargo	Boeing	MD-11	Boeing	MD-11	
Cargo	Lufthansa Cargo	Boeing	777F	Boeing	777F	
Cargo	National Airlines	Boeing	747-400F	Boeing	747-400F	
Cargo	Nippon Cargo Airlines	Boeing	747-8F	Boeing	747-8F	
Cargo	QANTAS Freight	Boeing	747-400F	Boeing	747-8F	
Cargo	Qatar Airways Cargo	Boeing	747-8F	Boeing	747-8F	
Cargo	Qatar Airways Cargo	Boeing	777F	Boeing	777F	
Cargo	Singapore Airlines Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	Sky Lease Cargo	Boeing	MD-11	Boeing	MD-11	
Cargo	Sky Lease Cargo	Boeing	747-400F	Boeing	747-400F	
Cargo	UPS Air	Boeing	757-200PF	Boeing	757-200PF	
Cargo	UPS Air	Boeing	767-300F	Boeing	767-300F	
Cargo	Volga-Dneper	Antonov	An-124	Antonov	An-124	Infrequent LAX visitor
Cargo	Volga-Dneper	Antonov	An-225	Antonov	An-225	Infrequent LAX visitor
Cargo	Western Global	Boeing	747-400F	Boeing	747-400F	
Unknown	SkyWest Airlines			Mitsubishi	MRJ-90	Client not identified
Unknown	Trans States Airlines			Mitsubishi	MRJ-90	May convert to MRJ-70
Unknown	Trans States Airlines			Mitsubishi	MRJ-70	May convert to MRJ-90
VVIP	US Air Force	Boeing	747-200	Boeing	747-8	Infrequent LAX visitor
VVIP	US Air Force	Boeing	757-200	Boeing	757-200	Infrequent LAX visitor
VVIP	US Air Force	Boeing	C-17	Boeing	C-17	Infrequent LAX visitor

DEPARTMENT OF TRANSPORTATION**DISTRICT 7**

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*Serious Drought.
Making Conservation
a California Way of Life.*

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:

<http://www.ops.fhwa.dot.gov/publications/fhwahop12035/fhwahop12035.pdf>

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.

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:

Technical Advisory on Evaluating Transportation Impacts in CEQA by Governor's Office of Planning and Research, dated December 2018.

http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf

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.

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:

- 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

From: CRUZ, DHASSY C.
 To: CONCEPCION, VALMARIE A. (CASW)
 Subject: FW: Addition to Our LAX Comment Form: Notification
 Date: Tuesday, May 07, 2019 7:02:43 AM

From: Smartsheet Notifications [mailto:notification@smartsheet.com]
 Sent: Monday, May 06, 2019 9:24 PM
 To: CRUZ, DHASSY C.
 Subject: Addition to Our LAX Comment Form: Notification



[Our LAX Comment Form \(Prod\)](#)

Changes since 5/6/19 9:22 PM

2 rows added

2 rows added or updated (shown in yellow)

		Row ID	Full Name	Company Name	Email Address	Comments	Created	Project
		23	Martin McKenna		lawashidingsomething@gmail.com	Project description does not include the number of gates added to LAX by the project, nor the number of remote gates to be removed. This is deceptive and misleading. There are currently nine actual physical Remote Gates on the West Remote Pads, along with several RON spaces. These gates are only used during overflow conditions at TBIT and perhaps for other terminals as well. The MSC project was supposed to alleviate this situation, and the environmental documents for the MSC pNorth reject indicated that after project completion there would be a reduced need to use the Remote Gates. Therefore, after 2020 there will be very limited use of the Remote Gates, according to LAWA documents. The project proposes to add 21 new gates, and provides no consideration for the fact that there will be a massive increase in throughput capacity at the airport. In fact, the suggestion is that this is really just an improvement for the customer experience by eliminating remote gates in place of contact gates. The project description actually suggests that the plan calls for the elimination of only those Remote Gates that will be eliminated by the westerly expansion of Taxiway D (Section 3.1.2.2.1), which includes only five of the nine Remote Gates (according to Figure 6). Therefore, LAWA's plan is to replace five of the nine Remote Gates - that they have already stated will be of limited use by 2020 - with 21 full use gates in a new terminal and a new concourse, and makes no mention of the potential increase in passenger throughput and/or increased operations that will result of this work. This is of course completely absurd. There are nine Remote Gates. Even if LAWA decides to eliminate all nine of these gates, and even if we assume that this is truly a one-to-one swap for passenger experience only (which is not true), there would still be minimally 13 new gates at LAX after the project. The addition of 13 new gates for both domestic and international traffic must be fully analyzed in the	05/06/19 9:22 PM	ATMP

						EIR, including all aspects of the environment for which there are potentially significant impacts. This includes Air Quality, Noise, Traffic, etc.		
		24	Martin McKenna		lawashidingsomething@gmail.com	The south airfield work must be analyzed as part of the airfield improvements proposed for this project, including a description of the need, and specific justification for those improvements. The current explanation for these taxiway improvements is that this work will facilitate aircraft access to and from the new gates (according to the Project Description). These improvements as shown clearly go well beyond any reasonable level of work necessary to merely provide access to the new Terminal 9, as stated. This is again deceptive and misleading, and suggests that LAWA is trying to hide airfield improvement work within a discussion of a new terminal. With the addition of so many new gates on the south side of the airport, there is certainly additional congestion on those taxiways, which is triggering the need for these improvements. The analysis should properly address these improvements as necessary due to increased aircraft movements. It should be noted that the Fact Sheet also suggests that work proposed for Taxiway C is "for access to new terminal facilities", but properly lists this work under Airfield Improvements. Therefore, at a minimum, there is inconsistency with where these project items are discussed or listed in the existing information provided.	05/06/19 9:23 PM	ATMP

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From: [CRUZ, GHASSY C.](#)
 To: [CONCEPCION VALMARIE A. CASO](#)
 Subject: FW: Addition to Our LAX Comment Form: Notification
 Date: Tuesday, May 07, 2019 7:02:54 AM

From: Smartsheet Notifications [mailto:notification@smartsheet.com]
 Sent: Monday, May 06, 2019 9:28 PM
 To: CRUZ, GHASSY C.
 Subject: Addition to Our LAX Comment Form: Notification

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Changes since 5/6/19 9:25 PM

2 rows added

2 rows added or updated (shown in **yellow**)

?	?	Row ID	Full Name	Company Name	Email Address	Comments	Created	Project
		25	Martin McKenna		lawashidingsomething@gmail.com	The traffic analysis should include an intersection analysis for Century Blvd at Sepulveda Blvd. An alternative proposal should include elimination of this intersection altogether by finding alternative means for traffic to go from Century Blvd. westbound to southbound Sepulveda Blvd. Currently, the intersection at Sepulveda and Century Blvd. is not very problematic because there is virtually no incoming airport traffic that uses this intersection. Current airport traffic accesses ramps coming northbound out of the tunnel and prior to reaching Century Blvd., and only through traffic (primarily non-airport traffic) passes through this intersection. With the removal of the existing airport access ramps as part of the project, all northbound traffic on Sepulveda coming through the tunnel (except perhaps the new T9 traffic) will go through this intersection. This intersection will therefore be handling a massive increase in traffic volume and will become the new congestion point, likely causing backing up of traffic into the tunnel as exists currently. A better solution would be to eliminate any intersections for airport traffic to keep this flow moving, and to avoid this potential bottleneck. If the only remaining purpose for this intersection in the future is to provide a means for westbound Century Blvd. traffic to go southbound on Sepulveda, then a better solution would be to route that traffic onto the new overpass for seamless integration onto southbound Sepulveda.	05/06/19 9:25 PM	ATMP
		26	Martin McKenna		lawashidingsomething@gmail.com	The Fact Sheet indicates that the project would "elevate the passenger experience". That is not a fact. That is a goal to improve the passenger experience with the airport, and would be based on subjective surveying of passengers after the fact. This "Fact Sheet" is clearly just a PR campaign that purposefully suggests that there are no impacts from this	05/06/19 9:26 PM	ATMP

					project, and that this is only beneficial to the communities. The "Fact Sheet" ignores basic facts of this project, and does not include any discussion of potential impacts. As with the entire NOP and Initial Study, there is no mention of growth in traffic and/or operations that would be enabled by the project and the potentially significant unavoidable impacts associated with that growth. Because of this omission, impacts are ignored completely.		
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From: [Samimi, Seena Max](#)
To: [QUINTANILLA, EVELYN Y.](#)
Cc: [Reznik, Benjamin M.](#); [Hinks, Matt](#); [Brower, Neill](#); [Fisher, Sarah \(sfisher@theparkingspot.com\)](#)
Subject: Comment Letter re ATMP
Date: Monday, May 06, 2019 3:29:08 PM
Attachments: [Letter to LAWA 20190503 re ATMP NOP Comments.DOCX.pdf](#)

Dear Ms. Quintanilla,

On behalf of The Parking Spot, attached please find our comment letter regarding the ATMP. Please confirm receipt.

Best,

ss

Seena Max Samimi | Attorney at Law
Jeffer Mangels Butler & Mitchell LLP | JMBM
1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067
D: (310) 785-5344 | **M:** (310) 972-1318 | **E:** SSamimi@JMBM.com



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Ref: 76911-0001

May 6, 2019

VIA E-MAIL

Los Angeles World Airports
Land Use and Entitlement Section
Attention: Evelyn Quintanilla,
EQuintanilla@lawa.org
Chief of Airport Planning I
P.O. Box 92216
Los Angeles, California 90009-2216

**Re: Comments on Notice of Preparation for
Los Angeles International Airport Airfield &
Terminal Modernization Project**

Dear Ms. Quintanilla:

We represent TPS Parking Management, d.b.a. The Parking Spot (“TPS”), the owner and operator of extensive remote parking and transportation services and a major aggregator of travelers to Los Angeles International Airport (“LAX”). TPS understands the need for and supports the concept of Los Angeles World Airports’ (“LAWA”) Airfield & Terminal Modernization Plan (“ATMP” or the “Project”), and applauds LAWA's efforts to improve the efficiency of access to the Central Terminal Area (the “CTA”) and to accommodate additional flights. We write to provide comments on the Initial Study and Notice of Preparation (the “NOP”) for the Project.

As a preliminary matter, we are compelled to note the clear interconnection and interdependency between the ATMP and the Landside Access Modernization Program (the “LAMP”). The decision by LAWA to treat the LAMP and ATMP as separate projects, rather than as the closely interrelated parts of the same overall modernization plan for the airport that they are, does not appear motivated by operational concerns, but rather a desire to avoid evaluating the cumulative effects of the combined larger project as a whole.

Notwithstanding the characterization of the Project, we submit the following comments on the NOP regarding the contents of the eventual environmental impact report (“EIR”) for the Project.

The EIR must include a thorough and accurate analysis of each of these issues. TPS also reserves the right to submit further comments as the processes associated with the California Environmental Quality Act (“CEQA”) and National Environmental Policy Act (“NEPA”) progress.

1. The Project Description Ties The ATMP and LAMP Closely Together, and Although LAWA Should Have Treated Them as a Single Project, This EIR Must Evaluate the Potential for Significant Cumulative Effects of Both Projects, Among Others.

The ATMP contains numerous landside improvements that are extensions of, or should have been combined with, the LAMP. These includes landside access roadways, additional stops along the automated people mover (“APM”), and integration with the APM. Further, traffic pattern alterations created by the ATMP will affect the facilities constructed as part of the LAMP and vice-versa. For all of these reasons, LAWA should properly have evaluated these projects as a single project, rather than chopping it into smaller, separately evaluated pieces.

Staff present at the April 17, 2019 Scoping Meeting offered puzzling rationales for piecemealing the ATMP and LAMP improvements to LAWA. Among these were the claims the ATMP and LAMP somehow served different purposes and were not physically related. The EIR must make a good-faith effort to explain why piecemealing was proper here.

Among other things, the ATMP incorporates the automated people mover (“APM”) constructed as part of the LAMP. A proposed APM stop appears calculated for location within the proposed “interface between Terminal 1 and Concourse 0,” and coordinated construction of the two appears planned. (NOP, p. 6.) Similarly, the proposed Terminal 9 appears to include significant infrastructure to integrate with LAMP facilities, including the APM, adding a stop dedicated for Terminal 9. (*Id.*, p. 8.) Other integrated elements include new roadway segments that would serve the Central Terminal Area (“CTA”) and connect to the AMP and ITFs. (*Id.*, pp. 9–10.) The EIR must evaluate each of these closely in connection with the LAMP, and must evaluate their effects in conjunction with and in addition to those of the LAMP and other current and foreseeable development, particularly because both projects may proceed simultaneously or at very least with substantial overlap.

2. The EIR Must Fully Evaluate Transportation, Traffic, and Related Impacts, and Disclose the Trade-Offs Inherent in Privileging Single, Private Automobile Access to the CTA.

According to the Initial Study and Checklist prepared for the Project (the “IS”), a major purpose of the ATMP is to “improve vehicle access into and out of the LAX CTA . . . [i]n conjunction with providing landside access to Terminal 9.” (IS, p. 59.) As part of facilitating and improving

vehicular access, the ATMP should evaluate whether to prioritize (as the LAMP did) single-rider vehicles, rather than large-capacity vehicles capable of efficiently transporting large numbers of people into the CTA.

Permitting shuttles and similar service vehicles benefits traffic under both primary analytic methods for traffic impacts. First, it reduces congestion in the CTA “feeder” roadways by reducing the overall number of vehicles circulating at any given time. Secondly, it reduces vehicle miles travelled by collecting single- and double-rider vehicles at centralized locations outside the CTA, rather than permitting endless circulation in and around the CTA. The EIR must therefore consider limitations on single-rider vehicles and prioritizing access for large-capacity vehicles.

Prioritizing these vehicles also creates a cascading series of benefits related to reductions in other impacts associated with vehicle travel. These include criteria air pollutants, ozone precursors, and greenhouse gas emissions, as well as traffic noise. Further, accommodating single-rider vehicles would result in greater and unnecessary energy use, as well as the wasteful and inefficient use of such resources, in comparison to large-capacity vehicles. The EIR must evaluate and disclose these trade-offs and permit decisionmakers to understand the wide-ranging effects of privileging single private automobiles over vehicles that can facilitate the greater and more efficient movement of people and luggage at LAX.

3. LAWA Must Coordinate the EIR with Review Required by NEPA.

LAWA must avoid the procedural mistakes of the LAMP and coordinate the review required by CEQA and NEPA. The NOP contains no reference to any NEPA document; however, as detailed in our prior correspondence, NEPA regulations mandate cooperation between federal and local agencies to reduce duplication in the NEPA process and streamline review. The regulations require that agencies “*shall* cooperate . . . to the fullest extent possible.” (40 CFR § 1506.2(b) [emphasis added].) This includes preparing *one* document that complies with all applicable laws (40 CFR § 1506.2(c)). As provided in 40 CFR § 1506.2, cooperation includes preparation of joint research and studies, including impact statements. (Subds. (b)(2), (4).) This also eases the burden on the public, who have a single document to review and comment upon.

Among other things, this also necessarily requires a detailed evaluation of each of the alternatives eventually analyzed in the document. As NEPA requires evaluation of each alternative at the same level of detail, the EIR should do so, to promote maximum consistency with the requirements of NEPA (with which the FAA must comply) and ensure a single document for public review and comment. This is all the more important because the FAA may identify impacts that LAWA does not, or vice versa, and the document should explain to an apprehensive public the differences in analytic method and significance thresholds.

4. The EIR Must Include Detailed and Enforceable Mitigation.

Unlike the LAMP environmental documentation (and particularly the Environmental Assessment), which inappropriately left a substantial number of decisions to be made at a later time, the analysis of the ATMP EIR and its NEPA counterpart must be specific, thorough, and robust. These documents cannot defer development and enforcement of mitigation, and must provide the fullest possible opportunity for public review and comment.

5. The EIR Must Evaluate the Potential for the Project to Physically Divide an Established Community.

The IS appears to “write off” this impact. However, the Project Description indicates the ATMP will involve the acquisition of other property within the community surrounding LAX, including land currently occupied by the Los Angeles Community Colleges. (See p. 10.) This creates the potential for the further extension of LAX proper into the surrounding community, with accompanying adverse physical impacts from operations at LAX in comparison to those previously occurring within the community. These include, but are not necessarily limited to traffic, nighttime light and glare, noise, and localized air emissions, including incremental increases in risk of cancers and other health risks.

6. The EIR Must Evaluate Hazards and Water Quality Impacts.

The IS notes Concourse 0 will occupy a space that includes LAX’s existing groundwater remediation system. The EIR should include a full analysis of the effects of moving this system, including the potential for release of contaminated water or treatment media. The EIR also should evaluate whether a short- or long-term interruption of groundwater remediation would result, and the effects of such an interruption.

7. Impacts to Nearby Business Operations Must be Analyzed.

The proposed ATMP will effect operations of nearby businesses, including parking, access and accessibility, circulation, construction impacts, and traffic. In the case of off-airport parking operators, it will affect how those businesses take clients to and from the CTA from the off-airport locations. All of these effects should be appropriately analyzed and mitigated.

Los Angeles World Airports
Comments on ATMP NOP
May 6, 2019
Page 5

TPS looks forward to participating the environmental review process, and to ensuring LAWA prepares a thorough, adequate, and defensible analysis of its proposed action(s).

Sincerely,

A handwritten signature in black ink, consisting of a stylized, cursive script that appears to read 'SEENA MAX SAMIMI'.

SEENA MAX SAMIMI for
Jeffer Mangels Butler & Mitchell LLP



Neighborhood Council of Westchester Playa

8726 South Sepulveda Boulevard, PMB 191A, Los Angeles, CA 90045
213.473.7023 • 310.304.3564 fx
email: inquiries@ncwpdr.org • www.ncwpdr.org



May 8, 2019

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

Dear Ms. Quintanilla,

The Neighborhood Council of Westchester Playa supports in concept the long overdue modernization of the LAX airfield and terminals, and submits the following comments to the Notice of Preparation - Airfield and Terminal Modernization issued by LAWA on April 4, 2019. However, the few short weeks given for review of such a significant project is insufficient for the community to digest and respond. The amount of time given for community review is incongruous with the project's impacts.

Not long ago, Westchester and Playa del Rey neighbors were concerned over proposals by LAWA officials to move the LAX north runway closer to our homes. Through a ground breaking agreement with neighbors, including the Alliance for a Regional Solution to Airport Congestion (ARSAC), LAWA agreed to shelve those plans and instead established the parameters for modernization, not expanding, LAX.

The Neighborhood Council of Westchester Playa [NCWP] understands the importance of having a safe, modern and efficient "world class airport". We also recognize the need of our residents to be protected from the impacts of airport operations, which we believe is the heart of being a "first class neighbor". The NCWP believes that continuing improvements can be made even greater through detailed and thoughtful feedback from organizations like ours. It is in this spirit the Neighborhood Council of Westchester Playa [NCWP] wishes to provide comments to this NOP. We have grouped these comments into several themes:

- 1) Roadway Congestion & Improvements,
- 2) Aircraft Noise and Pollution Patterns & Monitoring, and
- 3) Impacts on City Services
- 4) Other Considerations

1) Roadway Congestion and Improvements

Road congestion, both in the CTA and the neighborhood, needs to have a unified solution and needs to be built on the improvements and changes LAMP will make once Phase 1 is complete in 2023.

- The Traffic Study for this project must be the same as and consistent with recent and current projects i.e., SPAS, LAMP, LAX Northside.
- The NCWP understands the proposed roadway improvement, a new vehicular entrance near Concourse 0 that crosses Sepulveda west to east and creates new queuing space for cars via an elevated roadway network merging back into the current main airport entrance at Century. However, this proposal does not fully address Central Terminal Area (CTA) traffic that often queues past the Sepulveda/Lincoln merge.
 - In fact, this proposal in isolation further encourages cars to drive into the airport, thus reducing the efficacy of the LAMP project. As such, the NCWP believes equal priority should be made for an additional roadway crossing Sepulveda west to east at 96th street. This crossing would either replace or repurpose the bridge now at Vicksburg feeding the ITF -West as an alternate drop off for cars, providing better access into that future parking facility, and creating stronger Taxi/Rideshare access to the ITF-West.
 - A more thoughtful roadway design with two bridges would allow vehicle drivers and passengers to choose the entrance option they wish for LAX, either direct to the CTA, or direct to the ITF-West, Metro AMC Station, or ConRAC.
 - Taxi/Rideshare staging area needs to be further clarified and enhanced and additional bridging at 96th could provide for this.
 - The creation of additional multi-story parking via a proposed garage at Terminal 9 also appears to contradict the promise of LAMP to reduce vehicular traffic in the CTA and would create a wall of dead activity fronting Century Boulevard as the Gateway to LA Business Improvement District seeks to create a more vibrant walkable Century Boulevard. The NCWP requests that LAWA revisit the size and scale of this parking facility and consider reducing or eliminating it in favor of adding additional parking at the ITF-West.
 - The NCWP requests study of additional roadway mitigation and improvements to Airport Boulevard between Westchester/Arbor Vitae and La Tijera Boulevard. There is a clear nexus between this corridor and the successful operations of LAX. Current signage directs vehicles to LAX rental car returns. La Tijera Blvd also represents an alternate connection to LAX from the 405. NCWP

requests that during the NOP for the Airfield and Terminal Modernization Project, that LAWA study the impact Terminal 9 and proposed enhancements through an additional station of the Automated People Mover will have on shifting traffic, requiring additional improvements to Airport Blvd for the aforementioned section. Study should include roadway reconstruction, utility undergrounding and relocation, enhanced wayfinding and signage, and stronger bike and pedestrian connections.

- In this same vein, NCWP requests study of additional roadway mitigation and improvements to Aviation Boulevard between 111th Street and Century Boulevard and Aviation Boulevard between Arbor Vitae and La Cienega. Terminal 9 and Concourse 0 will potentially shift airport-bound vehicular traffic to the east. It is vital that major connections north and south accessing the LAMP area and the proposed improvements to the roadways in this area currently under development and proposed via this NOP take this into account and do not just focus on Sepulveda and the interchanges there. Sidewalks and bike facilities along the aforementioned portions of Aviation are either in bad condition or do not exist. In order to maximize benefits of our growing transit network that will be completed along this corridor, and to prevent further vehicular traffic Concourse 0 and Terminal 9 could bring, we ask LAWA to study pedestrian and cycling infrastructure in this portion of roadway in the EIR for this project

2) Aircraft Noise and Pollution patterns

This project replaces aircraft gates now adjacent to Playa del Rey neighbors with gates much closer to the core of the airport's operations with Concourse 0 and Terminal 9. This will reduce plane and ground support equipment emissions and could reduce noise for Playa del Rey. However, noise and pollution patterns in the neighborhoods around the airport could change. Quantifiable goals need to be established, monitored and enforced.

- As noise and pollution profiles are updated, year over year, it is critical that LAWA continue to monitor aircraft noise and emissions closely and report out on these changes via established channels. We, the NCWP, formally request LAWA to work with the FAA to reopen the City of Los Angeles' Sound Insulation Program for neighbors who did not own their homes and were therefore not offered sound insulation at the time the program was last open over a decade ago. We also request that as sound patterns change that appropriate mitigation measures be put in place to protect the Westchester/Playa community from noise intrusions.

3) Impacts on City Services

Though LAWA developments and improvements to the airport offer new amenities to the travelers, stronger transit connections, and better roadway networks, the NCWP is

concerned that the additions of Concourse 0 and Terminal 9, along with a general increase in the number of passengers, demands on City Services, in particular Fire and Ambulance services, are likely to increase.

- As such, the NCWP formally requests that LAWA study the demands the airport will have for future Fire and Ambulance services on the landside as a result of Concourse 0, Terminal 9 and general passenger growth. Currently, the City of Los Angeles Ambulance services are regularly called into LAX to serve passengers and workers in the terminals. Concourse 0 and Terminal 9 along with an overall increase in passengers will likely present additional service demands on these services and we request that LAWA study this as part of the NOP for the Airfield and Terminal Modernization Project.

4) Other Considerations

The Neighborhood Council of Westchester Playa has included additional comments specific to sections of this NOP. Specifically, we have the following comments on the “Initial Study and Checklist”.

- What are the passenger growth assumptions used in the analysis for this project?
- The environmental setting for the Project Description (Pg. 59) needs to specifically acknowledge the Westchester Playa community as an important stakeholder.
- Environmental Factors Potentially Affected (Pg. 63) must be changed to identify “Public Services” as being significantly affected. Thereby requiring a full EIR review of these areas to result in maintaining a proper level of service.
- Section III Air Quality (Pg. 65) is properly identified as a “Potentially Significant Impact” and is a primary concern to the community. More neighborhood monitoring on a permanent basis is needed.
- Section VI. Energy (Pg. 66) and Section VIII. Greenhouse Gas Emissions (Pg. 67) are correctly identified as a “Potentially Significant Impact” and are important issues for our neighborhoods and should not be solved by the weakening of existing regulations and policies.
- Section XIII. Noise (Pg. 69) is correctly identified as a “Potentially Significant Impact” but the EIR review needs to take into account not only noise levels but also the substantial increase in the number of times the ambient noise levels increase due to the increase in flights and traffic the availability of more gates creates.
- Section XVI Population and Housing [Pg. 69] must be identified as “Potentially Significant Impact”. The NC strongly disagrees with the findings that the proposed

project would have less than significant impacts on Population and Housing. LAWA repeatedly touts the job creating ability of LAWA. It is known by LAWA that over 20% of the residents of Playa del Rey and Westchester and Inglewood are employed by LAWA or a related LAWA serving enterprise. LAWA also fails to consider the cumulative impact of the 2.5 million square feet of development slated to occur on the Northside of Westchester Parkway and its impacts on housing and population to the area. LAWA fails to consider the cumulative impact of the massive developments underway in Inglewood and the cumulative impact of the ongoing gentrification caused by the southward advancement of adjacent “Silicon Beach” and the Inglewood developments. Further evaluation is required in the EIR.

- As stated above, Section XV. Public Services (Pg. 69-70) must be identified as a “Potentially Significant Impact”. We cannot keep adding more space and more people without matching those increases with the commensurate increase in Public Services. We totally disagree with the “No Impact” findings as they relate to “Fire Protection” and “Police Protection” as they do take into account the 100 million passengers per year that come into our community as they leave the CTA. Also, the 50,000 employees that work at LAX (which will increase) do require our Public Services. The EIR must analyze the community impact to Westchester Playa. Further, please keep in mind our Public Services will have to support the 2.0m sq. ft. Northside and LAMP, which will be completed, operational and occupied before this project starts.
As it concerns “e. Other Public Services”, while the increase in employment is certainly an economic positive, it does create higher demand for numerous basic services commuting through our neighborhoods - better streets and safety.
- Section XVI. Recreation (Pg. 70) is categorized as “No Impact”. However, with 50,000 workers (and the number increasing) this area should be studied in the EIR as we believe there is a demand and benefit from providing workers at LAX outdoor recreational opportunities that are so lacking in our community.
- Section XVIII. Transportation (c.) (Pg. 70) needs to be identified as a “Potentially Significant Impact” due to the proposed configuration and impacts to Sepulveda Blvd. Also, the EIR study needs to address traffic intersections in a manner consistent with previous studies on recent and ongoing projects at LAX, namely SPAS, LAMP and LAX Northside.
- Section XXI Mandatory Findings Of Significance (Pg. 72) is properly classified as a “Potentially Significant Impact”
 - Within this area, “(b) Does this project have impacts which are individually limited, but cumulatively considerable?” is very important to the EIR. Table 4 – Development Projects At/Adjacent to LAX is critical to the EIR analysis. As some of those projects have been approved years ago and not yet completed, the data should be updated for current forecasts,

government regulations and any other items that could be important to this new LAX ATMP EIR. Because we cannot afford to continue building under flawed assumptions from older projects.

- Again, as this area of the NOP restates all of the findings for all of the areas in the “Initial Study and Checklist”, the fundamental flaw is the data for cumulative projects has not been adjusted to today’s reality. As an example, this section still contends that ‘Public Services’ are fine and “No further evaluation in the EIR is required”. We fundamentally disagree with this conclusion. Public Services must be an important part of the EIR process.
 - Of particular concern is (c.) “ Does the project have environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly?”. The EIR should once again determine both the individual project impacts and look to determine if prior projects have attained their environmental goals.
- Section XXI Mandatory Finding of Significance/Cumulative Impacts/ Population and Housing (page 120).
 - The NCWP strongly disagrees with the findings that the proposed project would have “less than significant” impacts on Population and Housing. LAWA repeatedly touts the job creating ability of LAWA. It is known by LAWA that over 20% of the residents of Playa del Rey and Westchester and Inglewood are employed by LAWA or a related LAWA serving enterprise. LAWA also fails to consider the cumulative impact of the 2.5 million square feet of development slated to occur on the Northside of Westchester Parkway and it's impacts on housing and population to the area. LAWA fails to consider the cumulative impact of the massive developments underway in Inglewood and the cumulative impact of the ongoing gentrification caused by the southward advancement of adjacent “Silicon Beach” and the Inglewood developments. Further evaluation is required in the EIR.
 - In the current environment, Westchester Central Business area is often flooded with taxis, limos, shuttles, busses and TNC. LAWA should take the opportunity to provide a parking lot with sufficient amenities specifically for these vehicles that are servicing LAX and its customers.
 - New roadways and approaches to LAX will not doubt be confusing for passengers. Signage to and from LAX should direct travelers to Century Blvd as much as possible.

The NCWP is an active stakeholder in both LAX and the community. In order to ensure positive benefits to Westchester and Playa del Rey residents come to fruition through LAX modernization, it is imperative we ask the right questions and study the right

Ms. Quintanilla
May 8, 2019
Page 7 of 7

things. To strike the right balance is essential and we will work with all to better LAX, our City of Los Angeles and our local communities. We thank you for your commitment to work with the neighborhood and us.

Thank you and feel free to contact us if you need more information.

/s/ Cyndi Hench

Cyndi Hench
NCWP President

Cc: Councilmember Mike Bonin
BOA Commissioner Valeria Velasco
Chad Molnar, Chief of Staff, CD11
Samantha Bricker, Deputy Executive Director, LAWA
Michelle Schwartz, Deputy Executive Director, LAWA
David Mannix, NCWP
Matthew Teclé, CD11
Geoff Thompson, CD11
Glenda Silva, NCWP/LAWA

CALIFORNIA COASTAL COMMISSION

South Coast Area Office
301 E Ocean Blvd, Suite 300
Long Beach, CA 90802
(562) 590-5071



May 9, 2019

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

**RE: Los Angeles International Airport Airfield and Terminal Modernization Project
Coastal Commission Staff Comments on Initial Study (SCH# 2019049020)**

Dear Ms. Quintanilla,

Thank you for the invitation to comment on the Notice of Preparation of an EIR and Initial Study for the International Airport Airfield and Terminal Modernization Project (Project) at Los Angeles International Airport (LAX). While the Project does not appear to be located within the coastal zone, the project site is adjacent to the El Segundo Dunes, a 302-acre remnant of the once extensive dune habitat area, which is a unique coastal resource, environmentally sensitive habitat area, and a biodiversity hotspot.

The habitat area that is now reduced to the El Segundo Dunes historically covered approximately 4.5 square miles of coastline, between Westchester south to the base of Palos Verdes Peninsula and from the Pacific Ocean inland for approximately one-half mile, and may have extended into the area currently covered by the airfield. The El Segundo dunes system was not disturbed until the turn of the Century when beach communities in the area began to develop. Between 1966-1972, LAX purchased all properties west of LAX and cleared all residential development from the area. The airport subsequently excavated and recontoured the easternmost strip, comprising 70% of the backdunes, to realign Pershing Drive. By the late 1970's native revegetation had not occurred, and there were major extirpations of native biota on the site and, while patches of vegetation existed throughout the site, only about 40 acres of undisturbed habitat were left. The Coastal Commission has since authorized habitat restoration projects to enhance the El Segundo/LAX Dunes habitat area. Recently, a number of rare and unique wildlife species, including the El Segundo Blue Butterfly, Burrowing Owls, legless lizards, and Blainville's horned lizards, have been found in the dunes.

Coastal Commission staff recommend that LAWA coordinate with the U.S. Fish & Wildlife Service, California Department of Fish and Wildlife Service, U.S. Geological Survey, California Coastal Commission, the Bay Foundation, and other appropriate parties to identify potential Project impacts to local floral and faunal populations, including increased impervious surface area, reduction in landscaped area, tree removal, and increased greenhouse gas emissions. If mitigation for identified impacts is not feasible within the airfield or the Project area identified in the NOP/IS, the EIR should analyze opportunities to incorporate dune restoration into the Project. Dune restoration could also mitigate for potential visual impacts identified in the EIR. Finally, a restored dune system could mitigate potential impacts to the Project area associated with sea level rise, severe storms, and tsunamis.

Please note that the comments provided herein are preliminary in nature. More specific comments may be appropriate as the Project develops. Coastal Commission staff requests notification of any future activity associated with this Project or related projects. Thank you for the opportunity to comment on the NOP/IS. Please contact me at (562) 590-5071 with any questions.

Sincerely,


Dani Ziff
Coastal Program Analyst

cc: Carolyn Lin, Los Angeles World Airports



CITY OF INGLEWOOD
ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT
Planning Division



Christopher E. Jackson, Sr.
Department Director

Mindy Wilcox, AICP
Planning Manager

MAY20 10:04AM

May 13, 2019

Evelyn Quintanilla
Chief of Airport Planning II
Los Angeles World Airports
P.O. Box 92216
Los Angeles, California 90009 - 2216

RE: Comments to the Notice of Preparation/Initial Study for the Airfield and Terminal Modernization Project

Dear Ms. Quintanilla,

Thank you for the opportunity to provide comments to the Notice of Preparation/Initial Study for the Airfield and Terminal Modernization Project. We have no initial comments at this time regarding the Notice of Preparation. However, we request that you continue to apprise us of all developments in the CEQA process for this project.

Should you have any questions please contact Senior Planner, Fred Jackson at (310) 412-5230. We look forward to reviewing the draft Environmental Impact Report and we appreciate the opportunity to provide input.

Sincerely,

Mindy Wilcox, AICP
Planning Manager

cc: Christopher E. Jackson, Sr. – Director



May 14, 2019

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

Dear Ms. Quintanilla,

The Gateway to LA Business Improvement District (BID) would like to express our support for the Airfield and Terminal Modernization (ATM) Project that Los Angeles World Airports will be studying in the years ahead. Our organization submits the following comments warranting further study in response to the Notice of Preparation (NOP) that Los Angeles World Airports (LAWA) issued for this project on April 4, 2019.

For nearly two decades Gateway to LA has helped shaped the future of LAX by working in partnership with LAWA. This has included reports and studies that both organizations and Council District 11 helped spearhead and fund. One such study is the ULI TAP from 2011 that helped codify changes that the Gateway to LA is eager to see come to fruition, the Landside Access Modernization Program (LAMP) and the included Automated People Mover (APM) to transform not only mobility for Angelenos in and out of the world's 4th busiest airport, but the land and streets in and around our BID.

It is vital to our BID membership that every effort be made to maximize the beneficial investments LAMP is making, while minimizing any disadvantages that construction and other factors may have over the next 5 years. This is also true for the Airfield and Terminal Modernization project, especially since this project, through the construction of Concourse 0 and Terminal 9 will bring the LAX Central Terminal Area into our BID. After reviewing the NOP for we submit the following comments grouped into 5 policy/position groupings:

A) Impacts to Century Boulevard & Streetscapes, B) Improving Non-Vehicular Connections over Sepulveda & to LAMP Infrastructure, C) Parking Concerns for Terminal 9 and Strengthening the ITF West, D) Addressing Known Constraints On or Near 98th Street, and E) Extending Existing Design Standards for a Seamless LAX and Gateway Experience.

A) *Impacts to Century Boulevard & Streetscapes*

As noted in the NOP for this project, for the first time LAX Terminal Operations will cross Sepulveda Boulevard with the proposed location of Terminal 9 at the corner of Century and Sepulveda. This means the Gateway to LA BID will no longer be the doorstep to our region, we will in fact be part of the fabric of LAX. This is a significant change for our membership, but one that ultimately creates strong opportunities for our BID and the Westchester community at large if threats are minimized with thoughtful study. The LAMP project will already be making improvements to Century Boulevard with an additional vehicular lane on the south side of Century. This will also include implementation of the Century Streetscape Plan adopted by the City of Los Angeles in 2018 for portions of this aforementioned southern side. A number of other roadway improvements including reconstructions and creation of new roadways are also planned for LAMP. Some will cut right through existing parking lots in our BID, and roadways just to the north of our hotels and businesses will also change for the better.

The ATM Project proposes rather significant changes to the roadways around the lighted iconic LAX pylons, including improvements for those wishing to enter the airport driving south on Sepulveda and those driving north on Sepulveda. Elevated roadways are proposed along portions of 98th Street coming down the to-be-constructed Jetway Blvd. New bridges and overpasses are proposed at the intersection of Century and Sepulveda and a bit beyond to the east. Construction of this level of infrastructure as proposed in early designs of the ATM begs the question: what kind of impact will this have on Century Boulevard during and after construction?

- The Gateway BID supports the potential improvements to infrastructure this project could bring as the CTA shifts eastward, but just as LAMP included roadway and streetscape improvements on the south side of Century as part of the EIR and entitlement process, we ask that LAWA study inclusion of roadway and streetscape improvements on the north side of Century.
- More specifically, this would entail implementation of the Century Streetscape Plan along all northern parcels stretching from Aviation to Sepulveda by LAWA as part of the entitlement process in order to compliment improvements LAWA is making on the south side along these sections and to compensate for the degradations to the current streetscapes in this area that more roadway and overpass constructions will have. We would like LAWA to study this proposal in the forthcoming EIR for this project.
- Additional study should be done to determine profiles of elevated roadway shadows and the need for underpass and street lighting improvements in any

areas adjacent to new overhead access roadways. We wish to avoid dark, cavern-like spaces created by elevated roadways and exacerbated by tall buildings in the area and note the need for additional detail and study into pedestrian and roadway lighting to combat this.

- Elevated roadways close to our hotels also pose a risk of additional noise and air pollution. We ask that LAWA study potential mitigations for additional roadway noise as part of the EIR including study of noise-reducing materials, sound walls or buffers, and trees on ground-level and elevated roadways. We recognize that bridges and elevated roadways pose design challenges for landscaping and irrigation, but ask that studies be done now to determine what is viable. The Gateway BID would like to avoid the highway overpass effects of today's entrance into the airport through thoughtful design.
- Furthermore, we request study of potential mitigations like sound insulation for changing sound profiles that airport operations and aircraft in much closer proximity to our BID and hotel guests will have when Terminal 9 and Concourse 0 are directly across the street from our businesses. We also request study of potential mitigations for degraded air quality that jet exhaust from Terminal 9 and Concourse 0 will bring to our BID.

B) Improving Non-Vehicular Connections over Sepulveda & to LAMP Infrastructure

While roadway improvements offer an opportunity to reduce congestion around the airport and our BID, let us not forget that improving bridges and overpasses, and elevating roadways cannot serve cars alone at the expense of other modes of transportation, especially as we connect this area with Metro's extensive rail network via the Automated People Mover due to open in 2023. Many of our BID members manage properties within walking distance of the current Central Terminal Area. The ATM project, with Terminal 9 east of Sepulveda, and Concourse 0 just west of Sepulveda proposes an eastward shift, thus shortening the walk our tenants and hotel guests would need to make in order to enter the airport. Currently, the walking experience crossing Sepulveda Boulevard for those seeking to enter or exit our BID area is a terrible and dangerous experience. At grade crosswalks over Sepulveda are poorly maintained by Caltrans and involve traffic signals stopping heavy vehicular traffic along that corridor. The ATM project offers the opportunity to rethink this corridor and build it for current needs pedestrians face, as well as future needs that emerging mobility options could bring.

- The Gateway BID requests that LAWA study and include strong pedestrian and active transportation connections in all future bridges, overpasses and elevated roadways. This should include wide sidewalks, pedestrian-scaled lighting, clear entrances and ADA accessibility up to and including elevators for pedestrians at current roadway levels needing to access elevated roadways to bypass current at-grade crossings over Sepulveda to Concourse 0 and beyond. Priority for short-as-possible walking distances between the

north side of Century Boulevard and the proposed APM station serving Terminal 9, including potentially grade-separated pedestrian connections, should also be studied. This should also include study of bike and scooter areas within new roadways that are physically separated and buffered from vehicular traffic. Wayfinding scaled to and built for pedestrians is also needed, as well as study into what landscaping and streetscape beautification opportunities could emerge in a new roadway system that fixes the current design that is hostile toward pedestrians.

- At grade improvements of Sepulveda Boulevard should also be studied as part of the EIR of this project. This could include a wider center divider along portions of Sepulveda Boulevard that now just have a K-Rail. This wider center divider would not only create a pedestrian refuge island for a wide highway hostile to pedestrians, it would also open up the opportunity to kick down the ugly wall that separates our BID from the CTA, the Caltrans-maintained portion of Sepulveda, with landscaping, either at grade or raised. The Gateway to LA BID considers our palm trees located in the median of Century Boulevard an important asset to placemake our corridor. With Concourse 0 and Terminal 9 directly flanking Sepulveda, the time seems right for LAWA to study safety and aesthetic improvements that a landscaped and well-lit median could bring to Sepulveda Boulevard from Century Boulevard northward to Lincoln.
- Strong pedestrian connections into Terminal 9 should also be considered, including ease of access for those walking from the south and the north side of Century.
- Study into strengthening pedestrian and active transportation connections to LAMP infrastructure: the IFT West, Metro AMC Station, and the ConRAC, as well as the future proposed APM stop at Terminal 9 should be undertaken as part of the ATM EIR. This includes improvements to lighting, ADA accessibility, landscaping and other amenities scaled toward pedestrians.
- In summary, anywhere new roadway connections are proposed to “untie the knot,” recognition from LAWA that the knot goes beyond car traffic to pedestrians and scooter users, cyclists, etc. is needed. Study to strengthen these non-vehicular connections to future Terminal 9 and Concourse 0, as well as to LAMP infrastructure under construction should occur now as part of the EIR.

C) Parking Concerns for Terminal 9 and Strengthening the ITF West

Proposals for Terminal 9 east of Sepulveda means our BID will be closer than ever to the thousands of passengers and workers that pass through LAX on a daily basis. Current preliminary plans for Terminal 9 could create a rather significant barrier between the businesses of the Gateway to LA BID and these passengers and workers by including a massive wall of multi-story parking. Parking garages also double-down on the model of driving to the airport, potentially undoing the goals

our BID has to make the Gateway to LA a destination in its own right, rather than a place to drive through. Our members agreed to adopt the Century Streetscape Plan to create new opportunities for placemaking and we are concerned a huge new parking structure fronting Century Boulevard could undermine and undo that.

- The Gateway BID requests that LAWA conduct a thorough and detailed analysis of parking needs to support Terminal 9, and whether any of those needs could be met by increasing the parking profile of the ITF West located one APM stop away from Terminal 9. This detailed analysis should include traffic patterns of cars entering new roadways serving Terminal 9 to determine how shifting parking profiles to existing LAMP infrastructure in the ITF West could reduce congestion at what is already and what will be congested “knot” at Sepulveda and Century.
- We request that any parking infrastructure analyzed and/or proposed that fronts Century Boulevard include mixed-use zoning classifications for ground-floor retail or commercial opportunities to undo the dead wall effect that many parking garages create.
- We also request keen attention to architectural design and aesthetics be paid to any parking facilities supporting Terminal 9 to beautify the Century Boulevard corridor by extending the mid-century design principles that LAMP, current CTA improvements, and the Century Streetscape Plan all forward. This would include study of architectural and art enhancements for any facades of proposed garages facing Century Boulevard.
- It should be stated that an ultimate win for the Gateway to LA BID here would be a strong visual connection to Terminal 9 with uninterrupted sightlines from businesses on the north side of Century south to the new terminal. Strong pedestrian connections, clear wayfinding for those pedestrians, ease of access to a new APM station and beyond to Terminal 9, and attention to implement the landscaping, street furniture, street lighting, and paving materials of the Century Streetscape Plan would all be beneficial and break down the very real barriers that a multi-story parking structure could create.

D) Addressing Known Constraints On or Near 98th Street

Once complete, the LAMP project will create new streets and provide for some significant enhancements to existing streets adjacent to the Gateway BID. These should help create additional space and travel paths for vehicles, while dramatically improving the pedestrian experience along portions of roadways where landscaping, irrigation and new street lighting are included. Our membership believes these improvements will further enhance the desirability of properties within the BID, while the airport gains connections to better serve its needs medium and long-term. There are however portions of streets immediately adjacent to our BID that LAMP overlooked and did not entitle improvements for. As

LAWA seeks to shift operations of the airport further east into our area, this is the time for analysis to address these missing links and much needed improvements.

- The ATM project calls for additional roadway capacity along 98th Street west of Avion Drive. Though LAMP will be creating a major new connection to the 405 via a new extension of 98th Street to be built between Bellanca and La Cienega, an existing portion of 98th running west between Bellanca and Airport remains untouched. LAMP will merely restripe this roadway from three lanes to four. The Gateway BID remains concerned that a 4-lane configuration will create bottlenecks from traffic coming off the 405 traveling westward as an alternate to Century. Buildings within our BID also use 98th as a kind of “back door,” more capable of handling truck deliveries than Century. Since a majority of this constrained portion of 98th Street between Bellanca and Airport is flanked on the north by parking lot and some easement/landscaping along the Four Points Sheraton on the northeast corner of 98th and Airport, we would like LAWA to analyze whether a road widening on the north side of 98th Street between Bellanca and Airport is possible. This widening would include reconstruction of the street, overhead utility undergrounding, wider sidewalk widths, street lighting to match other designs and investments LAMP is currently making on adjacent roadways, and irrigated, landscaped parkways between 6 and 8 feet wide capable of hosting shade trees and designs that match or emulate other LAMP streetscape investments.
- The Gateway BID also asks for the ATM project to analyze the missing link of Bellanca between Century and 96th Street. This portion of street is not being touched as part of the LAMP program but design, safety, and lane width issues exist here. The Metro First/Last Mile Team called for this portion of Bellanca running north between Century and 96th to be redesigned given the ample space available, particularly between 98th and 96th. Our BID membership recognizes that disruptions to our businesses during a potential roadway construction here are not ideal, but are outweighed by the benefit of roadways that better serve our properties and the major investments LAWA is currently making in LAMP infrastructure on 96th Street. With Terminal 9 and Concourse 0 potentially further encouraging vehicles to drop off passengers and employees east of Sepulveda at the ITF West, ensuring a stronger Bellanca connection to 96th seems vital. We ask that LAWA include a study to reconstruct Bellanca from a center line drain roadway from 98th to 96th to a crowded roadway, underground any overhead utilities, provide for wider sidewalk widths, match street lighting LAMP is currently making on adjacent roadways, and irrigate and landscape parkways between 6 and 8 feet wide capable of hosting shade trees and designs that match or emulate other LAMP streetscape investments. We ask for similar investments not including roadway crowning, but including undergrounding of overhead utilities, providing wider sidewalks, matching street lighting LAMP is currently

making on adjacent roadways, and irrigating and landscaping parkways between 6 and 8 feet wide capable of hosting shade trees and designs that match or emulate other LAMP streetscape investments for the portion of Bellanca running from Century to 98th.

- For the portion of 98th Street between Sepulveda and Vicksburg where an overhead, bridged roadway is proposed, The Gateway to LA BID requests study of how the ground level (non-bridged portions) of this street can provide street parking, additional space for multi-modal transportation networks, landscaping and beautification, pedestrian wayfinding, and pedestrian-scaled lighting.
- During construction of proposed street improvements, The Gateway to LA BID requests that LAWA and future contractors to this project plan for large, clear signage to be placed on sidewalk and road barriers noting active and currently open businesses behind these barriers.

E) Extending Existing Design Standards for a Seamless LAX and Gateway Experience

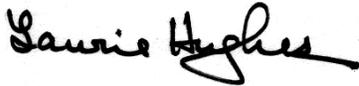
LAX continues to improve the guest experience by focusing on the quality and design of each airport terminal as it undergoes renovation. Additional improvements have been made on the roadways in the Central Terminal Area with dramatic light posts and improvements to signage. We are focused on the same goals here in the Gateway BID by adopting the Century Streetscape Plan that heavily references the mid-century aesthetic of the Theme Building, the future terminal renovations, the APM, and the golden age of jet aviation LAX is known and loved for. Our members are thankful for the effort LAWA management and Council District 11 have had in further extending the aesthetics of our Century Streetscape Plan beyond Century Boulevard into the streets in and around the LAMP project.

- While our membership recognizes that current proposals for the ATM project are very much in their early phases of design, we nevertheless would like to ask that LAWA study and consider that all new roadways and infrastructure related to this project include the same lighting, street furniture, hardscape materials, and landscape plant palettes we are planning for in the Century Streetscape Plan.
- We also request that lighting and design aesthetic for the landside portions of Terminal 9 facing north toward our BID and Concourse 0 facing east toward our BID mirror selections already constructed or under construction within existing terminals in the CTA today. We recognize early proposals do not often reflect this level of detail, but nevertheless wish to signal the importance of this going forward in creating a seamless LAX to Gateway Experience.

The Gateway to LA Business Improvement District is invested heavily in the future of LAX, while building stronger connections to Westchester and the major investments

Metro is making to better connect us to the region. We support the very important and needed work the LAMP project is doing to achieve this but ask that LAWA continue improving connections between LAX and our BID by studying the proposals we have put forth for the EIR it will undertake for the Airfield and Terminal Modernization Project. We look forward to future improvements that will jointly serve the BID and the airport's interests and ask for your continued commitment to work closely with us as we transform the area into a well-connected, well-designed, seamless link between the LAX of the future and a growing and vibrant Los Angeles region.

Best Regards,



Laurie Hughes
Executive Director
Gateway Los Angeles
5901 W. Century Blvd., Ste. 100
Los Angeles, CA 90045

Cc:

Sean Burton, President, Board of Airport Commissioners
Valeria Velasco, Vice President, Board of Airport Commissioners
Eric Garcetti, Mayor - City of Los Angeles
Mike Bonin, Councilmember - City of Los Angeles, CD11
Chad Molnar, Chief of Staff - City of Los Angeles, CD11
Geoff Thompson, LAX Liaison - City of Los Angeles, CD11
Samantha Bricker, Deputy Executive Director, Los Angeles World Airports
Michelle Schwartz, Deputy Executive Director, Los Angeles World Airports
Cyndi Hench, President, Neighborhood Council of Westchester / Playa
Christina Davis, President/CEO, LAX Coastal Chamber of Commerce
Karen Dial, President, Drollinger Properties

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To: [CRUZ, OHASSY C.](#)
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Date: Tuesday, May 28, 2019 4:36:58 PM



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[Our LAX Comment Form \(Prod\)](#)

Changes since 5/28/19 4:34 PM

1 row added , 1 row changed
1 attachment added

1 row added or updated (shown in **yellow**)

Row 27

Row ID	27
Full Name	Brian Gonzalez
Company Name	Los Angeles Department of Water and Power
Email Address	brian.gonzalez@ladwp.com
Comments	This email transmits the Los Angeles Department of Water and Power's comments related to the Los Angeles International Airport Airfield and Terminal Modernization Project.
Created	05/28/19 4:34 PM
Project	General Comment

Changes made by web-form@smartsheet.com

1 attachment added

[LAX Airfield and Terminal Modernization Project.pdf \(855k\)](#) added by web-form@smartsheet.com on Row 27: Brian Gonzalez

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May 16, 2019

Evelyn Quintanilla
Chief of Airport Planning
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

Dear Ms. Quintanilla:

Subject: Comment Letter Regarding the Los Angeles International Airport Airfield and Terminal Modernization Project

The Los Angeles Department of Water and Power (LADWP) appreciates the opportunity to provide comment on the Notice of Preparation of an Environmental Impact Report (NOP/EIR) for the Airfield and Terminal Modernization Project (ATM Project). The mission of LADWP is to provide clean, reliable water and power to the City of Los Angeles. In reviewing the NOP/EIR, the LADWP has determined that the ATM Project may have impacts to Water System infrastructure/operations and respectfully submits the comments below.

COMMENTS

- The California Water Code (Sections 10910 through 10915) requires the preparation of a water supply assessment (WSA) by the public water system supplier that would provide water to any project as defined in Section 10912 of the Water Code including “a project that would demand an amount of water equivalent to, or greater than, the amount of water required by a 500 dwelling unit project.” Please verify if the ATM Project would be subject to the stated Water Code requirement for a WSA.
- In reviewing the Project NOP, LADWP notes the omission of the Century Trunk Line (Century TL) Project that is within the ATM Project footprint. The Century TL Project, as identified in LADWP’s Mitigated Negative Declaration (MND), approved in November 2018, delineates 3 project components: Century Trunk Line Unit 1, Century Trunk Line Unit 2, and the Sepulveda & Century Regulator Station (RS) Relocation. Century Trunk Line Unit 1 and the Sepulveda & Century RS Relocation, are within the ATM Project footprint:

Project	Expected Construction Dates	Description
Century Trunk Line Unit 1	October 2019 – June 2022	Installation of 10,800 feet of 24-inch and 48-inch earthquake resistant ductile iron pipe. Under an MOA between LAWA and LADWP, the project is split into 3 Phases. Construction will occur by LAWA and LADWP contractors.
Sepulveda & Century Regulator Station Relocation	2025	Replacement of an existing 70 year old Sepulveda & Century RS is located in the southbound lanes of Sepulveda Boulevard at the entrance to the Central Terminal of LAX. The RS is the main water supply source for LAX. Relocation requires coordination with LAWA.

- LADWP has been coordinating the design and construction of Century TL Unit 1 Project with the LAWA Landside Access Modernization Program Team and respectfully requests formal communication with the Los Angeles World Airports (LAWA) ATM Team to ensure the Century TL Project and Sepulveda & Century RS Relocation improvements are coordinated, planned, designed and constructed successfully. A mutually acceptable location for the relocation of the 70 year old RS currently located within the southbound lanes of Sepulveda Blvd at Century Blvd. has yet to be determined. The Century TL and Sepulveda & Century RS Replacement projects are critical components of the LADWP Water System that will ensure a reliable water supply to LAX and the surrounding area, and comply with the City of Los Angeles' water sustainability goals. Please coordinate Annette Flores of the LADWP Water Engineering & Technical Services Division for any questions or concerns regarding any of the components from the Century Trunk Line Project, at (213) 367-0827 or via email at annette.flores@ladwp.com .

Ms. Quintanilla
Page 3
May 16, 2019

For any questions regarding the above comments, please contact Mr. Brian Gonzalez, of my staff at (213) 367-2612 or via email at brian.gonzalez@ladwp.com.

Sincerely,

A handwritten signature in black ink that reads "Charles C. Holloway". The signature is written in a cursive style with a large initial "C" and a stylized "H".

Charles C. Holloway
Manager of Environmental Planning and Assessment

BG:naa

c: Ms. Annette Flores
Mr. Brian Gonzalez



9100 S. Sepulveda Blvd., Ste. 210
Los Angeles, CA 90045
tel 310.645.5151
info@laxcoastal.com

May 16, 2019

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

Dear Ms. Quintanilla,

The mission of the LAX Coastal Chamber of Commerce is to promote business and enhance the vitality of the community. We have long supported intelligent modernization of Los Angeles International Airport and look forward to giving its comments on the Environmental Impact Report (EIR) for the Airfield and Terminal Modernization Project (ATMP) at the appropriate time.

Presently, the Chamber submits the following comments and asks for additional study in response to the Notice of Preparation (NOP) that Los Angeles World Airports (LAWA) issued for this project on April 4, 2019.

Our organization believes the developments of Concourse 0 and Terminal 9 offer ample opportunity to better serve the traveling public and the communities around LAX. Infrastructure enhancements proposed in the NOP for the ATMP are a good start to reducing congestion and improving the efficiency of our Chamber's members who struggle with LAX-related traffic. Greater detail will need to be studied and so this letter will focus primarily on what we would like to see LAWA address in their EIR for this project. Our comments focus on a few key subject areas: Strengthening the Sepulveda Corridor, Maximizing LAMP Investments, and Enhancing Other LAX-Bound Corridors.

We are particularly interested in proposed improvements to airport safety by enhancing runway and aircraft taxi area design for the north runways consistent with our prior calls for airfield improvements. The proposed improvements would appear to prevent a long-standing worry of Westchester and Playa Del Rey from coming to fruition: the outboard north runway moving further north. We see this project as an important promise to be kept by the airport and look forward to these safety improvements that prevent further encroachment on communities we represent.

Strengthening the Sepulveda Corridor

One of the more impactful changes that the Airfield and Terminal Modernization Project (ATMP) has proposed to make is a shift eastward where the LAX of the future may straddle Sepulveda Boulevard with Concourse 0 to the west and Terminal 9 to the east. Currently Sepulveda just to the north of the airport's central terminal area's entrances is a vibrant, walkable, commercial business improvement district serving a wide variety of patrons. However, as one approaches LAX, that walkable corridor becomes quite inhospitable to pedestrians. There are tens of millions of passengers that pass through LAX every year and airport employees that work in the terminals every day that lack a clear, safe, and pleasant walk from LAX's central terminals to the vibrant commercial corridors along Sepulveda north of Lincoln. With Concourse 0



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and Terminal 9 both fronting Sepulveda, the Chamber asks LAWA to analyze what improvements can be made to Sepulveda's infrastructure and public space in order to improve the walking experience. This could include wider sidewalks, landscaped, irrigated, and tree-lined streets providing shade, better street lighting serving the needs of vehicles and pedestrians, improved and safer signalized crosswalks, center median landscaping like that to the north, pedestrian-scaled signage for wayfinding, and other changes that would improve connectivity and safety to the airport, while increasing foot traffic for our businesses.

The vehicular gridlock that Sepulveda faces has been getting worse over the years with car queues extending often well beyond Lincoln. The LAX Coastal Chamber therefore recommends that LAWA further develop proposals to improve the southbound Sepulveda entrances into LAX beyond initial ideas. This would include proposals noted in the NOP for this project, but should also include analysis for an additional bridge crossing Sepulveda that allows drivers traveling south to pass over Sepulveda heading east without the need for a traffic signal at or around the 96th Street area. With gridlock common at Lincoln and Sepulveda, another traffic signal at 96th seems guaranteed to worsen traffic, creating operational and logistical issues for the airport, and everyday headache for our membership. We urge LAWA to make maximum consideration and analysis for multiple road overpasses and roadway enhancements to untangle regularly snarling car backups, all the while addressing our earlier comments that pedestrians also need a better way into the airport via Sepulveda.

Maximizing LAMP Investments

LAX was and is a car drivers' airport. The Landside Access Modernization Program (LAMP) will change that and the LAX Coastal Chamber is very excited about those changes. In four years seamless connections to public transit, rental cars, and additional parking and drop off will mean that some of the car traffic that now queues on Sepulveda and Century seeking a way into the central terminal area, will instead be bound for the LAMP area and the three stops the Automated People Mover will connect with the airport. The NOP for this project mentions a fourth stop serving the airport terminals, making LAMP even more valuable and vital to complete.

It's important that LAWA conduct analysis on roadways, parking, and pedestrian connections for the ATMP that maximize the investments LAMP is already making, being sure not to focus too heavily on ways to make it easier to connect into the central terminal area, but to the central terminal area and LAMP while ensuring that surface streets in the community are not impacted by new designs.

Enhancing Other LAX-Bound Corridors

The LAX Coastal Chamber of Commerce represents a large, vibrant, and growing area in and around the airport. There are many ways to get to LAX utilizing corridors that form the spines of commercial activity for our organization. Building off our earlier comments regarding Sepulveda and LAMP, analysis of what mitigations and infrastructure improvements LAWA can make to support a potential Concourse 0 and Terminal 9 should not exclude these other corridors like Airport, Aviation, La Tijera, Hindry and La Cienega. LAMP will have mitigated portions of some of these corridors, but additional work remains and the ATMP could address gaps not addressed by LAMP.



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Doing an EIR analysis of additional vehicular capacity and pedestrian amenities on north/south streets that feed into LAMP east of Sepulveda, will also better feed a Concourse 0 and Terminal 9 and allow our membership less time in traffic as LAX continues to improve rankings and better serve passengers and employees.

The LAX Coastal Chamber of Commerce supports a more efficient, better-connected airport for our members and nearby communities where our members live. We ask that you address concerns laid out in this letter in the EIR you will be developing for the Airfield & Terminal Modernization Project. Terminal 9, Concourse 0, and the airfield safety improvements all present opportunities to keep promises and uphold trust, as LAWA seeks stronger physical connections to our community. The LAX Coastal Chamber welcomes the opportunity to play a productive role in this process. Please reach out to us with questions or any clarifications.

Sincerely,

A handwritten signature in blue ink, appearing to read "Christina Davis", enclosed in a blue circular stamp.

Christina Davis
President/CEO

Cc:

Mike Bonin, Councilmember - City of Los Angeles, CD11
Geoff Thompson, LAX Liaison - City of Los Angeles, CD11
Michelle Schwartz, Deputy Executive Director, Los Angeles World Airports
Cyndi Hench, President, Neighborhood Council of Westchester / Playa
Karen Dial, President, Drollinger Properties



MIKE BONIN

City of Los Angeles
Councilmember, Eleventh District

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

Dear Ms. Quintanilla,

In 2016, after more than a decade of litigation and years of acrimony between Los Angeles World Airports (LAWA) and airport neighbors, LAWA reached a landmark settlement agreement with Alliance for a Regional Solution to Airport Congestion (ARSAC), a neighborhood group representing Westchester and Playa del Rey residents, that finally paved the way for modernization at LAX. Through tough but fair negotiations that I brokered between ARSAC and LAWA, this agreement stopped the north runway from moving any farther north and firmly established common ground between the Westchester and Playa del Rey constituents I represent and airport officials by declaring "Modernization Yes; Expansion, NO."

As a result of this agreement between airport neighbors and LAX, decades of commitments to airport neighbors are finally coming to fruition, including:

- A series of major projects called the Landside Access Modernization Program (LAMP) designed to reduce car traffic and LAX-area air pollution. The projects include: Connecting LAX and Metro Rail; a Consolidated Rental Car Facility; and the elevated tram known as the Automated People Mover (APM);
- Roadway improvements to reduce congestion, and including more street trees, landscaping, street lighting and public space amenities around LAMP;
- An LAX Northside Plan, developed by the communities of Westchester and Playa del Rey, to prevent runway relocation northward, while providing community amenities like ball fields and athletic facilities, a dog park, neighborhood retail, and a green space buffer between residences to the north and future office space and the airport to the south; and
- Airfield safety improvements, without moving the LAX runways northward, and removing remote gates that have long caused noise and pollution for Playa del Rey.

My constituents and I understand the importance of having a safe, modern, and efficient "world class airport," while recognizing and standing behind the needs of airport neighbors to live and enjoy their communities without being unduly impacted by airport operations. I believe that LAX can be a world class airport as well as a first class neighbor, and I believe that this can be achieved by listening to airport neighbors, and through strong partnerships between LAWA and the neighborhood organizations that represent my constituents in Westchester and Playa del Rey. To that end, I wish to reiterate the concerns and potential opportunities raised by the Neighborhood Council of Westchester/Playa (NCWP) regarding the Notice of Preparation (NOP) for the Airfield and Terminal Modernization Project (ATMP) issued by LAWA on April 4, 2019.

This project is the first LAWA will undertake that analyzes infrastructure needs and improvements using Vehicle Miles Traveled (VMT), now required by the State of California, versus the legacy method

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using Level of Service (LOS). VMT is a more holistic method of assessing the transportation system that focuses on reducing car trips instead of just mitigating traffic growth. For the first time, the environmental analysis will support what we all know is true: when more people arrive at the airport by train, bus, biking, walking, and shared rides, the impact on surrounding communities is reduced. Making these alternatives convenient and attractive requires focusing surface transportation investments on the entire streetscape, including sidewalks, bike & scooter lanes, bus and shuttle infrastructure, in addition to the traditional focus on car traffic. As Chair of the Transportation Committee of the City Council and a Metro Board member, I call on LAWA to fully analyze and plan for complete streets infrastructure to provide for high-quality infrastructure that serves these new facilities. This includes safe and highly visible crosswalks, bright street lighting scaled to pedestrians and vehicles, high-quality landscaping and room for large shade-producing trees, sustainable water infrastructure, upgraded and undergrounded utilities, appropriately scaled sidewalks, a connected network of safer separated bike & scooter lanes, bus shelters and layover facilities, and strong wayfinding connections that clearly direct domestic and international visitors with clear signage.

A complete streets assessment of Sepulveda Boulevard is welcomed and needed to address that corridor's degraded public space and poor pedestrian connections to the neighborhoods and business improvement districts I represent. Current conditions are not befitting of a world class airport, and I believe we can do better.

For Concourse 0 and Terminal 9, I ask that you consider the infrastructure challenges presented by having terminal facilities flanking Sepulveda Boulevard, and seek to mitigate those issues. Roadway improvements like those proposed in the NOP could make a noticeable improvement to traffic queueing on Sepulveda that regularly causes headaches for my constituents traveling along this vital thoroughfare. However, in an effort to fully address the challenges of this corridor, I echo the concerns of my constituents that feeding traffic into the Landside Access Modernization Project (LAMP) area east of Sepulveda, with facilities like the ITF West, the Metro AMC Station, and the ConRAC is equally important to feeding traffic west into the congested Central Terminal Area (CTA).

I ask that LAWA study additional corridors and arterials to the east that provide more direct access into LAMP and help disperse the concentrations of traffic that often cause gridlock for my constituents along Sepulveda. It is also vital that all streets flanking LAMP and a potential new Concourse 0 and Terminal 9 are analyzed for opportunities to fill any existing gaps in complete streets infrastructure that pose barriers to travel by alternative modes and may persist even after LAMP is complete. The ATMP should address these gaps and provide my constituents and airport users with high-quality public spaces around LAX, welcoming millions to our city and region every year.

I also ask that you thoughtfully consider NCWP's proposals to study and monitor the full effects that airfield improvements may have on noise profiles and those living nearby; and it is time to reopen the LAX sound insulation program for homes in Westchester and Playa del Rey.

I expect this level of thoughtfulness and diligence from LAWA in order to fulfill our promise of delivering a world class airport that is also a first class neighbor, and I am ready to work with you to that end. I would encourage airport leadership to call on the expertise from sister agencies like the Department of Transportation (LADOT) and the Metropolitan Transit Authority (LA Metro) in order to provide even stronger connections to the airport via our ever-growing transportation networks.

Just a few years ago I stood side-by-side with neighborhood leaders and airport officials, ending decades of contention and declaring "Modernization, Yes; Expansion, NO." It is critical that we live by the spirit of that agreement, never forgetting that modernization must happen in partnership with local residents, and that LAX is an integral part of the local community. As LAX modernization moves forward, we must continue to modernize the linkages to the surrounding neighborhoods and the region

beyond, and make sure that the infrastructure and transportation systems we have in place in and around LAX provide the best possible passenger, and neighbor, experience.

Respectfully,

A handwritten signature in black ink that reads "Mike Bonin". The signature is written in a cursive, flowing style.

MIKE BONIN

Councilmember, 11th District

Cc: Deborah Flint, CEO - Los Angeles World Airports
Samantha Bricker, Deputy Executive Director - Los Angeles World Airports
Michelle Schwartz, Deputy Executive Director - Los Angeles World Airports
Sean Burton, President - Board of Airport Commissioners
Val Velasco, Vice President - Board of Airport Commissioners
Cyndi Hench, President - Westchester / Playa Neighborhood Council
Dave Mannix, Airport Relations Chair - Westchester / Playa Neighborhood Council
Laurie Hughes, Executive Director - Gateway to LA Business Improvement District
Karen Dial, President - Drollinger Properties
Christina Davis, President/CEO - LAX Coastal Chamber of Commerce
Denny Schneider, President - Alliance for a Regional Solution to Airport Congestion (ARSAC)

From: [Smartsheet Notifications](#)
To: [CRUZ, CHASSY, C](#)
Subject: Addition to Our LAX Comment Form: Notification
Date: Monday, July 8, 2019 6:23:39 PM

 [Our LAX Comment Form \(Prod\)](#)
Changes since 7/8/19 6:21 PM

2 rows added

2 rows added or updated (shown in **yellow**)

		Row ID	Full Name	Company Name	Email Address	Comments	Created	Project
		32				There are puddles and dried streams of human urine and feces alongside uncollected trash throughout all levels of each LAX parking structure levels in LAX P1, P2A, P2B, P3, P4, P5, P6, P7. This is a severe health hazard that is never cleaned by LAWA.	07/08/19 6:21 PM	General Comment
		33				There are puddles and dried streams of human urine and feces alongside uncollected trash throughout all levels of each LAX parking structure levels in LAX P1, P2A, P2B, P3, P4, P5, P6, P7. This is a severe health hazard that is never cleaned by LAWA.	07/08/19 6:21 PM	ATMP (NEPA)

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Changes since 7/29/19 4:16 PM

1 row added , 1 row changed
2 attachments added

1 row added or updated (shown in yellow)

Row 35

Row ID	35
Full Name	Cassie Truong
Company Name	Los Angeles County Metropolitan Transportation Authority
Email Address	truongc@metro.net
Comments	
Created	07/29/19 4:16 PM
Project	ATMP (NEPA)

Changes made by web-form@smartsheet.com

2 attachments added

[190729_LAX Airfield and Temrinal Mod_NEPA.pdf \(77k\)](#) added by web-form@smartsheet.com on Row 35: Cassie Truong

[190729_LAX Airfield and Temrinal Mod_CEQA.pdf \(88k\)](#) added by web-form@smartsheet.com on Row 35: Cassie Truong

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Metro

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

July 30, 2019

Evelyn Quintanilla
Los Angeles World Airports
P.O Box 92216
Los Angeles, CA 90009-2216
Sent by email (equintanilla@lawa.org) and LAWA Web Comment Form

RE: LAX Airfield and Terminal Modernization Project – CEQA Notice of Preparation

Dear Ms. Quintanilla:

Thank you for coordinating with the Los Angeles County Metropolitan Transportation Authority (Metro) regarding the proposed Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project (Project) located in the City of Los Angeles (City). Metro is committed to working with local municipalities, developers, and other stakeholders across Los Angeles County on transit-supportive developments to grow ridership, reduce driving, and promote walkable neighborhoods. Transit Oriented Communities (TOCs) are places (such as corridors or neighborhoods) that, by their design, allow people to drive less and access transit more. TOCs maximize equitable access to a multi-modal transit network as a key organizing principle of land use planning and holistic community development

The purpose of this letter is to outline recommendations from Metro concerning issues that are germane to our agency's statutory responsibility in relation to Metro's bus facilities and services, which may be affected by the proposed Project. In addition to the specific comments outlined below, Metro would like to provide the Project Sponsor the Metro Adjacent Development Handbook (attached), which provides an overview of common concerns for development adjacent to Metro bus stops and right-of-way (ROW). This document and additional resources are available at www.metro.net/projects/devreview/.

Metro provided similar comments on the NEPA Environmental Assessment scoping in a separate letter dated July 30, 2019. We are providing this letter in response to the Notice of Preparation (NOP) for the Project dated April 4, 2019, with the understanding that the due date for public comments was May 6, 2019. While we did not receive the NOP in time to enter comments by the due date, we provide this letter to assist the City with its completion of an adequate Draft Environmental Impact Report (EIR).

Project Description

The Project is adjacent to multiple bus lines and stops and includes the following improvements to LAX: airfield enhancements to increase 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 and reduce surface traffic congestion.

Comments on Bus Service

1. Service: The EIR should study impacts to bus transit service. Metro Bus Lines 40, 117, and 232 operate on Sepulveda Boulevard (Sepulveda). Metro Bus Lines 40 and 117 also service Century Boulevard (Century). Seven Metro Bus stops are within the Project scope at Sepulveda and 96th Street, Century and Sepulveda, Century and Avion Drive, and Airport Boulevard and Century. As multiple buses operate at the intersection of Sepulveda and Century, it is recommended that the intersection be kept open to avoid interruption to bus service. Other transit operators (including but not limited to Santa Monica Big Blue Bus, Torrance Transit, and Culver City Bus) provide service in this area and should be consulted. In addition, any changes to LAX City Bus Center as a result of the Project should be analyzed.
2. Roadway Design: Metro Bus Line 117 utilizes the western-most ramp on the half-cloverleaf ramps south of Century to transition from southbound Sepulveda to eastbound Century. Removal of this ramp will not allow Metro to serve Sepulveda and Century with the eastbound Bus Line 117. In addition, Metro bus stops on Sepulveda and Century provide access to the Clifton Moore Administration buildings which are within walking distance to existing LAX Terminals 1 and 7.
3. Automated People Mover (APM) Construction Impact: During construction, 96th Street will only allow for Metro Bus Line 117 to go eastbound if 96th Street is closed to westbound traffic. This will result in a circuitous route for the eastbound Metro Bus Line 117 and southbound Metro Bus Line 232 that departs from LAX City Bus Center and arrives at Sepulveda/Century. Construction at Terminal 9 may likely cause Metro to abandon the southbound Sepulveda/Century stop and eastbound Century/Aviation stop. Impacts to passengers served at these locations should be evaluated and minimized.
4. Post-APM Construction: Metro recommends new bus stops adjacent to the new APM station at Terminal 9. For buses coming from the south (e.g. Metro Bus Line 232), it would be convenient for patrons to have access to the APM. The stops could also be used by Torrance Transit Line 8. Since both lines use the Sepulveda tunnels, the design should incorporate new bus stops in both directions on the new roadways with convenient vertical transfers to the APM.
5. Final Bus Stop Condition: During construction, the stops must be maintained or relocated consistent with the needs of Metro Bus operations. Final design of each bus

LAX Airfield and Terminal Modernization Project
CEQA NOP – Metro Comments
July 30, 2019

stop and surrounding sidewalk area must be Americans with Disabilities Act (ADA)-compliant and allow passengers with disabilities a clear path of travel to the bus stop.

If you have any questions regarding this response, please contact me by phone at 213-922-2671, by email at LingS@metro.net, or by mail at the following address:

Metro Development Review
One Gateway Plaza MS 99-22-1
Los Angeles, CA 90012-2952

Sincerely,



Shine Ling, AICP
Manager, Transit Oriented Communities

Attachment and link:

- Adjacent Development Handbook: <https://www.metro.net/projects/devreview/>

Los Angeles County
Metropolitan Transportation Authority

METRO ADJACENT DEVELOPMENT HANDBOOK

A GUIDE FOR CITIES AND DEVELOPERS

MAY 2018



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Introduction

The Metro Adjacent Development Handbook provides guidance to local jurisdictions and developers constructing on, adjacent, over, or under Metro right of way, non-revenue property, or transit facilities to support transit-oriented communities, reduce potential conflicts, and facilitate clearance for building permits. The Handbook should be used for guidance purposes only. The Metro Adjacent Construction Design Manual and Metro Rail Design Criteria are documents that shall be strictly adhered to for obtaining approval for any construction adjacent to Metro facilities.

Who is Metro?

The Los Angeles County Metropolitan Transportation Authority (Metro) plans, funds, builds, and operates rail and bus service throughout Los Angeles County. Metro moves close to 1.3 million riders on buses and trains daily, traversing many jurisdictions in Los Angeles County. With funding from the passage of *Measure R* (2008) and *Measure M* (2016), the Metro system will expand significantly, adding over 100 miles of new transit corridors and up to 60 new stations. New and expanded transit lines will improve mobility across Los Angeles County, connecting riders to more destinations and expanding opportunities for adjacent construction and *Transit Oriented Communities (TOCs)*. Metro's bus and rail service spans over 1,433 square miles and includes the following transit service:



Metro Rail connects close to 100 stations along 98.5 miles of track and operates underground in tunnels, at grade within roadways and dedicated *rights-of-way (ROW)*, and above grade on aerial guideways. The Metro Rail fleet includes *heavy rail* and *light rail* vehicles. Heavy rail vehicles are powered by a third rail through a conductor along the tracks and light rail vehicles are powered by an *overhead catenary system (OCS)*. To operate rail service, Metro owns traction power substations, maintenance yards and shops, and supporting infrastructure.



Metro Bus-Rapid-Transit (BRT) operates accelerated bus transit, which serves as a hybrid between rail and traditional bus service. *BRT* operates along a dedicated ROW, separated from vehicular traffic to provide rapid service. Metro BRT may run within the center of a freeway or may be separated from traffic in its own corridor. BRT station footprints vary from integrated, more spacious stations to compact boarding areas along streets.

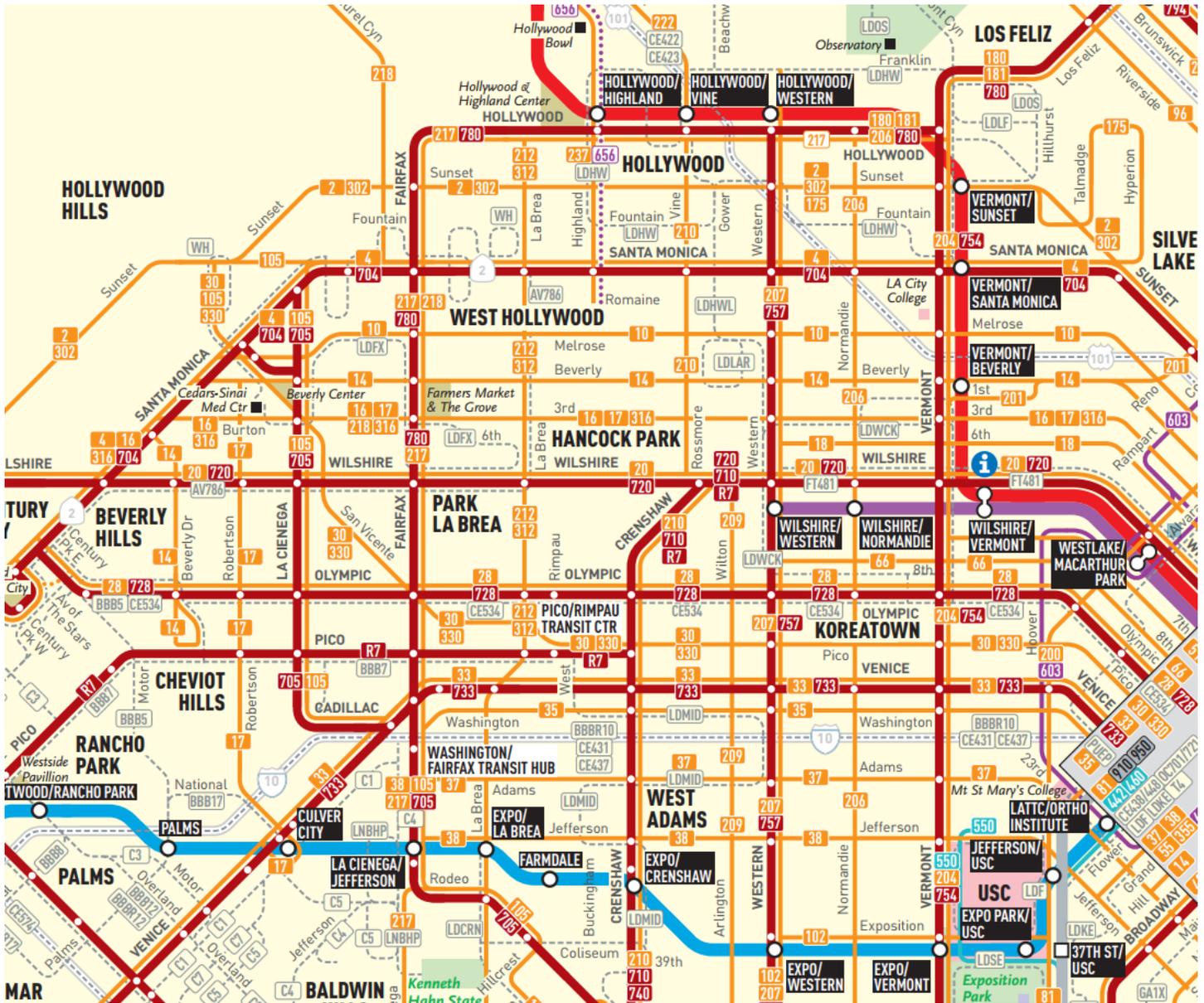


Metro Bus serves 15,967 bus stops, operates 170 routes and covers 1,433 square miles with a fleet of 2,228 buses. Metro "Local" and "Rapid" bus service runs within the street, typically alongside vehicular traffic, though occasionally in "bus-only" lanes. Metro bus stops are typically located on sidewalks within the public right-of-way, which is owned and maintained by local jurisdictions.



Metrolink/Regional Rail: Metro owns much of the ROW within Los Angeles County on which the *Southern California Regional Rail Authority (SCRRA)* operates *Metrolink* service. Metrolink is a commuter rail system with seven lines that span 388 miles throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties. As a SCRRA member agency and property owner, Metro reviews development activity adjacent to Metrolink ROW.

Metro Bus and Rail System Map (Excerpt)



As a street-running transit service, Metro’s “Rapid” and “Local” buses share the public ROW with other vehicles, cyclists, and pedestrians, and travel through the diverse landscapes of Los Angeles County’s 88 cities and unincorporated areas.

Introduction

Why is Metro Interested in Adjacent Development?

Metro Supports Transit Oriented Communities

Metro is redefining the role of the transit agency by expanding mobility options, promoting sustainable urban design, and helping transform communities throughout Los Angeles County. Leading in this effort is Metro's vision to create TOCs, a mobility and development approach that is community-focused and context-responsive at its core. The TOC approach goes beyond the traditional transit oriented development (TOD) model to focus on shaping vibrant places that are compact, walkable, and bikeable community spaces, and acknowledge mobility as an integral part of the urban fabric.

Adjacent Development Leads to Transit Oriented Communities

Metro supports private development adjacent to transit as this presents a mutually beneficial opportunity to enrich the built environment and expand mobility options for users of developments. By connecting communities, destinations, and amenities through improved access to public transit, adjacent developments have the potential to reduce car dependency and greenhouse gas emissions; promote walkable and bikeable communities that accommodate more healthy and active lifestyles; improve access to jobs and economic opportunities; and create more opportunities for mobility – highly desirable features in an increasingly urbanized environment.

Metro is committed to working with stakeholders across the County to support the development of a sustainable, welcoming, and well-designed environment around its transit services and facilities. Acknowledging an unprecedented opportunity to influence how the built environment throughout Los Angeles County develops along and around transit and its facilities, Metro has created this Handbook – a resource for municipalities, developers, architects, and engineers to use in their land use planning, design, and development efforts. This Handbook presents a crucial first step in active collaboration with local stakeholders; finding partnerships that leverage Metro initiatives and support TOCs across Los Angeles County; and ensuring compatibility with transit infrastructure to minimize operational, safety, and maintenance issues.



Metro Adjacent Development Handbook

What are the Goals of the Handbook?

Metro is committed to partnering with local jurisdictions and providing information to developers early in project planning to identify potential synergies associated with building next to transit and reduce potential conflicts with transit infrastructure and services. Specifically, the Handbook is intended to guide the design, engineering, construction, and maintenance of structures within 100 feet of Metro ROW, including underground easements, on which Metro operates or plans to operate service, as well as in close proximity to or on Metro-owned non-revenue property and transit facilities.

Metro is interested in reviewing projects within 100 feet of its ROW – measured from the edge of the ROW outward – both to maximize integration opportunities with adjacent development and to ensure the structural safety of existing or planned transit infrastructure. As such, the Handbook seeks to:

- Improve communication, coordination, and understanding between developers, municipalities, and Metro.
- Streamline the development review process by coordinating a seamless, comprehensive agency review of all proposed developments near Metro facilities and properties.
- Highlight Metro operational needs and requirements to ensure safe, continuous service.
- Identify common concerns associated with developments adjacent to Metro ROW.
- Prevent potential impacts to Metro transit service or infrastructure.
- Maintain access to Metro facilities for patrons and operational staff.
- Avoid preventable conflicts resulting in increased development costs, construction delays, and safety impacts.
- Make project review transparent, clear, and more efficient.
- Assist in the creation of overall marketable and desirable developments.

Who Should Use the Handbook?

The Handbook is intended to be used by:

- Local jurisdictions who review, entitle, and permit development projects and/or develop policies related to land use, development standards, and mobility
- Developers, Project sponsors, architects, and engineers
- Entitlement consultants
- Property owners
- Builders/contractors
- Real estate agents
- Utility owners
- Environmental consultants

Metro Adjacent Development Handbook

How Should the Handbook be Used?

The Handbook complements requirements housed in the *Metro Adjacent Construction Design Manual*, which accompanies the *Metro Rail Design Criteria (MRDC)* and other governing documents that make up the *Metro Design Criteria and Standards*. This Handbook provides an overview and guide related to opportunities, common concerns, and issues for adjacent development and is organized into three categories to respond to different stages of the development process:



1 Site Planning & Design



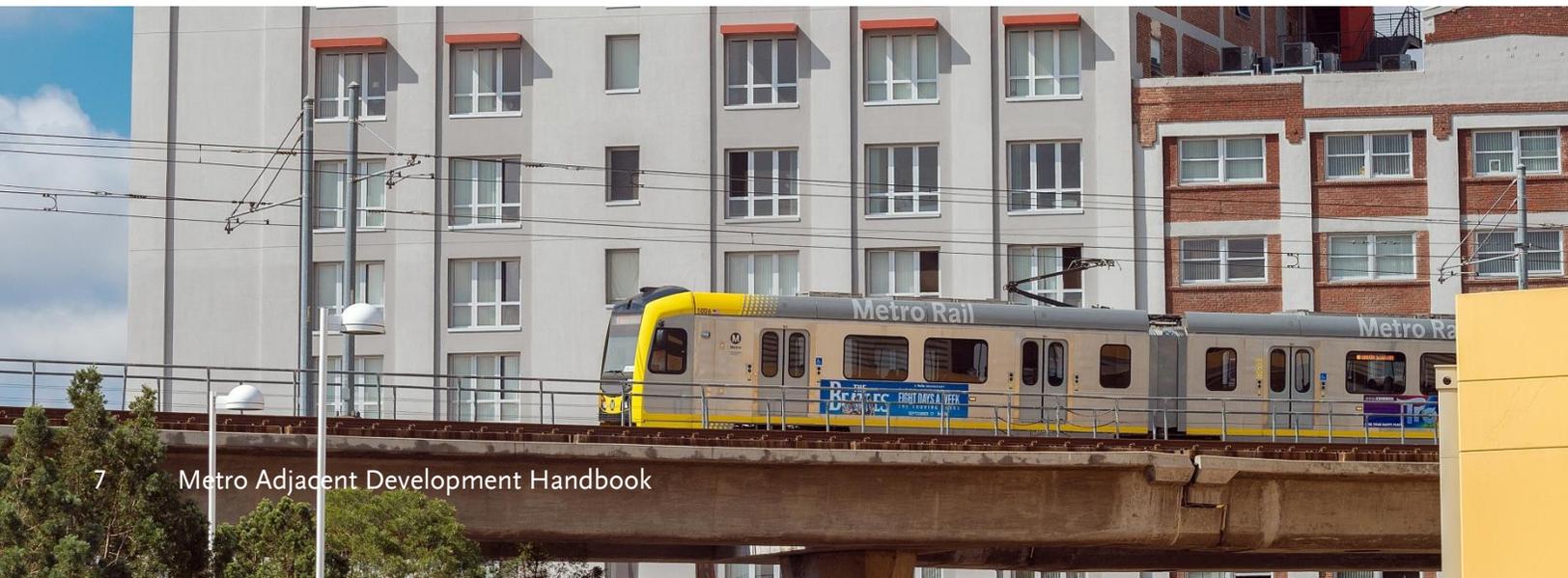
2 Engineering



3 Construction Safety & Monitoring

Each page of the Handbook focuses on a specific issue and provides best practices to avoid potential conflicts and/or create compatibility with the Metro transit system. Links to additional resources listed at the bottom of each page may be found under Resources at the end of the Handbook. Definitions for words listed in *italics* may also be found at the end of this Handbook in the Glossary.

Metro will continue to revise the Handbook, as needed, to capture input from all parties and reflect evolving Best Practices in safety, operations, and transit-supportive development.



Types of Metro ROW & Transit Assets

Conditions	Description	Common Concerns for Metro with Adjacent Development
 <p data-bbox="349 388 527 436">UNDERGROUND ROW</p>	<p data-bbox="548 388 909 441">Transit operates below ground in tunnels.</p>	<ul data-bbox="933 283 1437 546" style="list-style-type: none"> • Excavation support/tiebacks • Underground utilities • Shoring and structures • Ventilation shafts and street/sidewalk surface penetrations • Appendages (emergency exits, vents, etc.) • Surcharge loading of adjacent construction • Explosions • Noise and vibration/ground movement
 <p data-bbox="349 688 527 716">ELEVATED ROW</p>	<p data-bbox="548 661 909 745">Transit operates on elevated structures, typically supported by columns.</p>	<ul data-bbox="933 630 1347 777" style="list-style-type: none"> • Upper level setbacks • Excavation support/tiebacks • Clearance from the OCS • Crane swings & overhead protection • Column foundations
 <p data-bbox="349 961 527 989">OFF-STREET ROW</p>	<p data-bbox="548 919 909 1029">Transit operates in dedicated ROW at street level, typically separated from private property or roadway by a fence or wall.</p>	<ul data-bbox="933 871 1485 1081" style="list-style-type: none"> • Building setbacks from ROW • Travel sight distance/cone of visibility • Clearance from OCS • Crane swings & overhead protection • Storm water drainage for low impact development • Noise/vibration • Trackbed stability
 <p data-bbox="349 1228 527 1255">ON-STREET ROW</p>	<p data-bbox="548 1207 909 1291">Transit operates within roadway at street level and is separated by fencing or a mountable curb.</p>	<ul data-bbox="933 1134 1485 1365" style="list-style-type: none"> • Setbacks from ROW • Travel sight distance/cone of visibility impeded by structures near ROW • Clearance from OCS • Crane swings & overhead protection • Driveways near ROW crossings • Noise/vibration • Trackbed stability
 <p data-bbox="349 1501 527 1528">ON-STREET BUSES</p>	<p data-bbox="548 1480 909 1564">Metro buses operate on city streets. Bus stops are located on public sidewalks.</p>	<ul data-bbox="933 1491 1404 1554" style="list-style-type: none"> • Lane closures and re-routing • Bus stop access and temporary relocation
 <p data-bbox="349 1743 527 1816">NON-REVENUE/ OPERATIONAL ASSETS</p>	<p data-bbox="548 1690 909 1879">Metro owns and maintains non-operational ROW and property used to support the existing and planned transit system (e.g. bus and rail maintenance facilities, transit plazas, traction power substations, park-and-ride lots).</p>	<ul data-bbox="933 1690 1356 1869" style="list-style-type: none"> • Adjacent structure setbacks • Adjacent excavation support/tiebacks • Ground movement • Underground utilities • Drainage • Metro access

Metro Adjacent Development Handbook

Metro Review Phases

To facilitate early and continuous coordination with development teams and municipalities, and to maximize opportunities for project-transit synergy, Metro employs a four-phase development review process for projects within 100 feet of its ROW and properties:



PRELIMINARY CONSULTATION

Project sponsor submits Metro In-Take Form and conceptual plans. Metro reviews and responds with preliminary considerations.

1. Project information is routed to impacted Metro departments for review and comment.
2. Metro coordinates a meeting at the request of the project sponsor or if Metro determines it necessary following preliminary review.
3. Metro submits comment letter with preliminary considerations for municipality and/or project sponsor. Metro recorded drawings and standards are provided as necessary.

2 Weeks



ENTITLEMENT

Metro receives CEQA notice from local municipality and responds with comments and considerations.

1. If project has not previously been reviewed, Metro routes project information to stakeholder departments for review and comment. If Project has been reviewed, Metro transmits the correspondence to departments to determine if additional comments are warranted. Municipality and project sponsor are contacted if additional information is required.
2. Metro coordinates design review meetings at the request of the project sponsor or if Metro determines them necessary following drawings review.
3. Metro prepares comment letter in response to CEQA notice and submits to municipality. Metro Engineering coordinates with project sponsor as necessary to approve project drawings.

2-4 Weeks



ENGINEERING & REFINEMENT

Dependent on the nature of the adjacent development, project sponsor submits architectural plans and engineering calculations for Metro review and approval.

1. Metro Engineering reviews project plans, calculations, and other materials. Review fees are paid as required.
2. Metro Engineering provides additional comments for further consideration or approves project drawings.
3. If required, Metro and project sponsor host additional meetings and maintain on-going coordination to ensure project design does not adversely impact Metro operations and facilities.

2-4 Weeks



CONSTRUCTION SAFETY & MONITORING

Dependent on the nature of the adjacent development, Metro coordinates with project sponsor to facilitate and monitor construction near transit services and structures.

1. As requested by Metro, project sponsor submits a Construction Work Plan for review and approval.
2. Project sponsor coordinates with Metro to temporarily relocate bus stops, reroute bus service, allocate track, and/or complete safety procedures in preparation for construction.
3. Metro representative monitors construction and maintains communication with project sponsor to administer the highest degree of construction safety provisions near Metro facilities.

Varies

Metro Coordination

Best Practices for Municipality Coordination

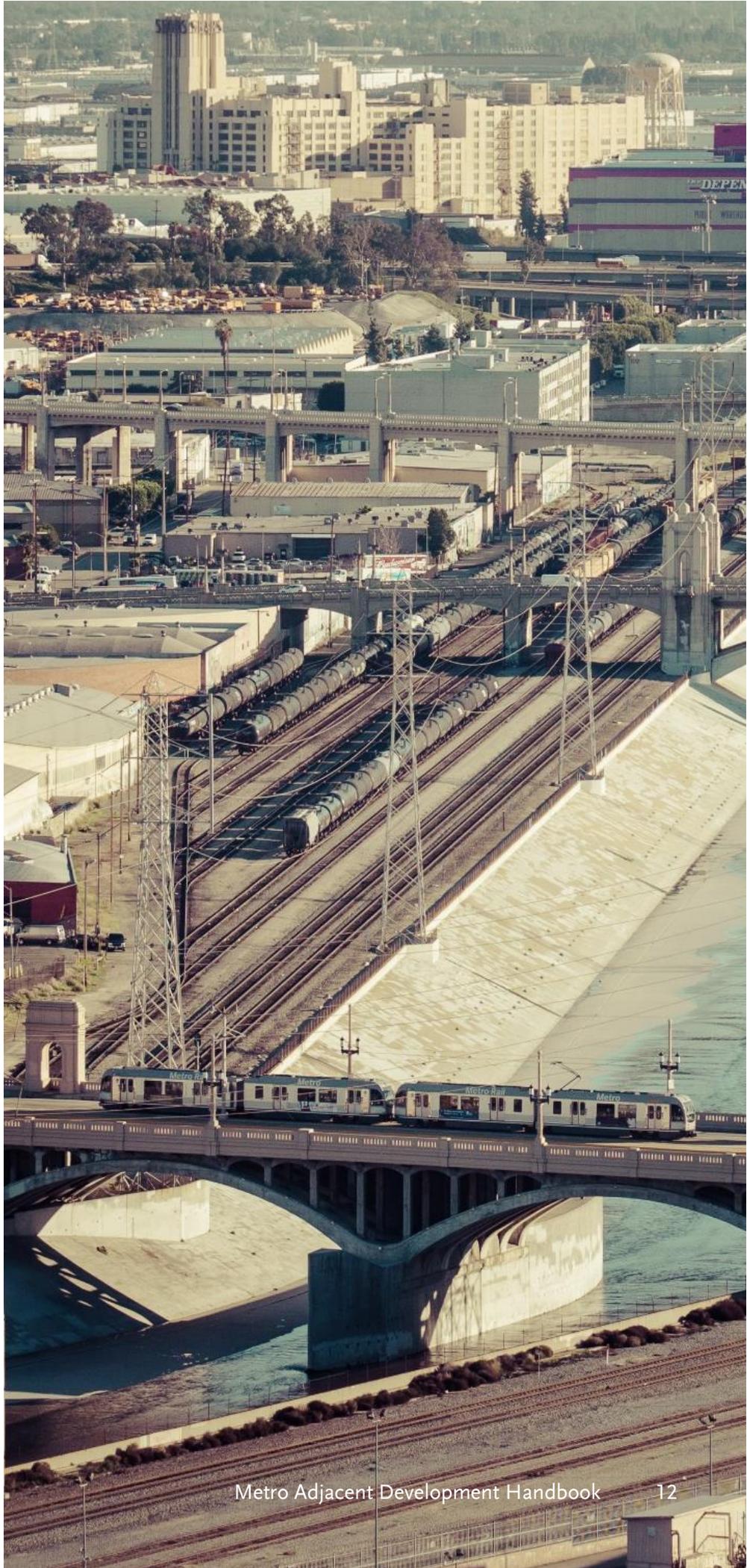
Metro suggests that local jurisdictions take the following steps to streamline the coordination process:

1. **Update GIS instruments with Metro ROW:** Integrate Metro ROW files into City GIS and/or Google Earth Files for all planning and development review staff.
2. **Flag Parcels:** Create an overlay zone through Specific Plans and/or Zoning Ordinance that “tags” parcels within 100’ from Metro ROW to require coordination with Metro early during the development process [e.g. City of Los Angeles Zone Information and Map Access System (ZIMAS)].
3. **Provide Resources:** Direct all property owners and developers interested in parcels within 100’ from Metro ROW to Metro resources (e.g. website, Handbook, In-Take Form, etc.).

Best Practices for Developer Coordination

Metro suggests that developers of projects adjacent to Metro ROW take the following steps to facilitate Metro project review and approval:

1. **Review Metro resources and policies:** The Metro Adjacent Development Review webpage and Handbook provide important resources for those interested in constructing on, adjacent, over, or under Metro right of way, non-revenue property, or transit facilities. Developers should familiarize themselves with these resources and keep in mind common adjacency concerns when planning a project.
2. **Contact Metro early during design process:** Metro welcomes the opportunity to provide feedback early in project design, allowing for detection and resolution of important adjacency issues, identification of urban design and system integration opportunities, and facilitation of permit approval.
3. **Maintain communication:** Frequent communication with stakeholder Metro departments during project design and construction will reinforce relationships and allow for timely project completion.







1

Site Planning & Design



1.1 Supporting Transit Oriented Communities

Adjacent development plays a crucial role in shaping TOCs along and around Metro transit services and facilities. TOCs require an intentional orchestration of physical, aesthetic, and operational elements, and close coordination by all stakeholders, including Metro, developers, and municipalities.

Recommendation: Conceive projects as an integrated system that acknowledges context, builds on user needs and desires, and implements elements of placemaking. Metro is interested in collaborating with projects and teams that, in part or wholly:

- Integrate a mix of uses to create lively, vibrant places that are active day and night.
- Include a combination of buildings and public spaces to define unique and memorable places.
- Explore a range of densities and massing to optimize building functionality while acknowledging context-sensitive scale and architectural form.
- Activate ground floor with retail and outdoor seating/activities to bring life to the public environment.
- Prioritize pedestrian scaled elements to create spaces that are comfortable, safe, and enjoyable.
- Provide seamless transitions between uses to encourage non-motorized mobility, improve public fitness and health, and reduce road congestion.
- Reduce and hide parking to focus on pedestrian activity.
- Prevent crime through environmental design.
- Leverage regulatory TOD incentives to design a more compelling project that capitalizes on transit adjacency and economy of scales.
- Utilize Metro policies and programs supporting a healthy, sustainable, and welcoming environment around transit service and facilities.



The Wilshire/Vermont Metro Joint Development project leveraged existing transit infrastructure to catalyze a dynamic and accessible urban environment. The project accommodates portal access into the Metro Rail system and on-street bus facilities.

Links to Metro policies and programs may be found in the [Resources Section](#) of this Handbook.



1.2 Enhancing Access to Transit

Metro seeks to create a comprehensive, integrated transportation network and supports infrastructure and design that allows safe and convenient access to its multimodal services. Projects in close proximity to Metro's services and facilities present an opportunity to enhance the public realm and connections to/from these services for transit patrons as well as users of the developments.

Recommendation: Design projects with transit access in mind. Project teams should capitalize on the opportunity to improve the built environment and enhance the public realm for pedestrians, bicyclists, persons with disabilities, seniors, children, and users of green modes. Metro recommends that projects:

- Orient major entrances to transit service, making access and travel intuitive and convenient.
- Plan for a continuous canopy of shade trees along all public right-of-way frontages to improve pedestrian comfort to transit facilities.
- Add pedestrian lighting along paths to transit facilities and nearby destinations.
- Integrate wayfinding and signage into project design.
- Enhance nearby crosswalks and ramps.
- Ensure new walkways and sidewalks are clear of any obstructions, including utilities, traffic control devices, trees, and furniture.
- Design for seamless, multi-modal pedestrian connections, making access easy, direct, and comfortable.



The City of Santa Monica leveraged investments in rail transit and reconfigured Colorado Avenue to form a multi-modal first/last mile gateway to the waterfront from the Expo Line Station.

Additional Resources:

[Metro Active Transportation Strategic Plan](#)

[Metro Complete Streets Policy](#)

[Metro First/Last Mile Strategic Plan](#)

[Metro Transit Supportive Planning Toolkit](#)



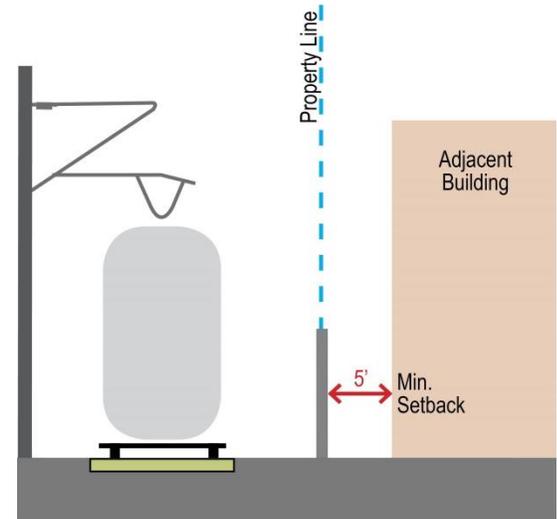
1.3 Building Setback

Buildings and structures with a zero lot setback abutting Metro ROW are of prime concern to Metro. Encroachment onto Metro property to construct or maintain buildings is strongly discouraged as this presents safety hazards and may disrupt transit service and/or damage Metro infrastructure.

Recommendation: Metro strongly encourages development plans include a minimum setback of five (5) feet to buildings from the Metro ROW property line to accommodate the construction and maintenance of structures without the need to encroach upon Metro property. As local jurisdictions also have building setback requirements, new developments should comply with the greater of the two requirements.

Entry into the ROW by parties other than Metro and its affiliated partners requires written approval. Should construction or maintenance of a development necessitate temporary or ongoing access to Metro ROW, a Metro *Right of Entry Permit* must be requested and obtained from Metro Real Estate for every instance access is required. Permission to enter the ROW is granted solely at Metro's discretion.

Refer to Section 3.2 –Track Access and Safety for additional information pertaining to ROW access in preparation for construction activities.



A minimum setback of five (5) feet between an adjacent structure and Metro ROW is strongly encouraged.

Additional Resources:

[Metro Adjacent Construction Design Manual](#)



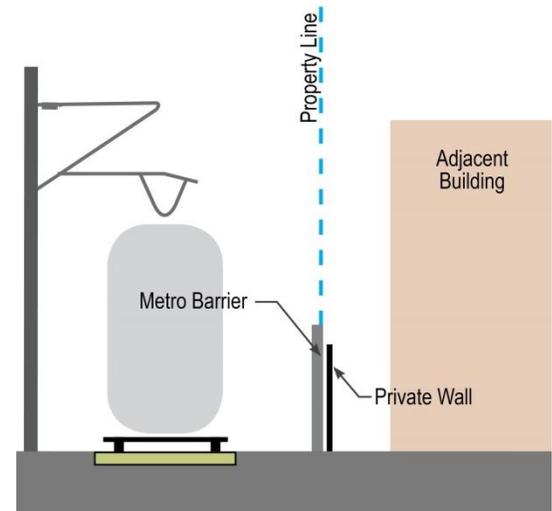
1.4 Shared Barrier Construction & Maintenance

In areas where Metro ROW abuts private property, barrier construction and maintenance responsibilities can rise to be a point of contention with property owners. When double barriers are constructed, the gap created between the Metro-constructed fence and a private property owner's fence can accumulate trash and make regular maintenance challenging without accessing the other party's property.

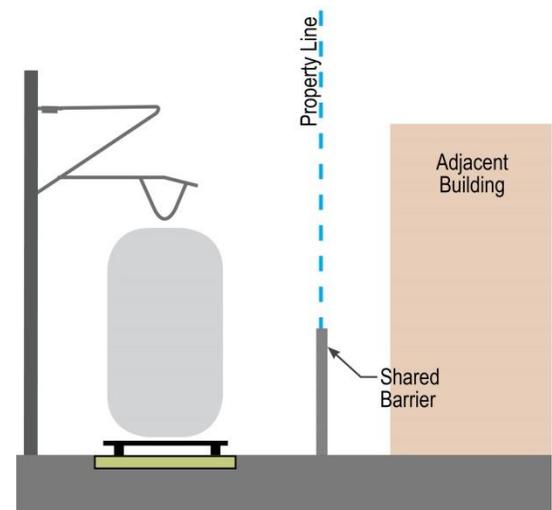
Recommendation: Metro strongly prefers a single barrier condition along its ROW property line. With an understanding that existing conditions along ROW boundaries vary throughout Los Angeles County, Metro recommends the following, in order of preference:

1. Enhance existing Metro barrier: if structural capacity allows, private property owners and developers should consider physically affixing improvements onto and building upon Metro's existing barrier. Metro is amenable to barrier enhancements such as increasing barrier height and allowing private property owners to apply architectural finishes to their side of Metro's barrier.
2. Replace existing barrier(s): if conditions are not desirable, remove and replace any existing barrier(s), including Metro's, with a new single barrier built on the property line.

Metro is amenable to sharing costs for certain improvements that allow for clarity in responsibilities and adequate ongoing maintenance from adjacent property owners without entering Metro's property. Metro Real Estate should be contacted with case-specific questions and will need to approve shared barrier design, shared-financing, and construction.



Double barrier conditions allow trash accumulation and create maintenance challenges for Metro and adjacent property owners.



Metro prefers a single barrier condition along its ROW property line.



1.5 Project Orientation & Noise Mitigation

Metro may operate in and out of revenue service 24 hours per day, every day of the year, and can create noise and vibration (i.e. horns, power washing). Transit service and maintenance schedules cannot be altered to avoid noise for adjacent developments. However, noise and vibration impacts can be reduced through building design and orientation.

Recommendations: Use building orientation, programming, and design techniques to reduce noise and vibration for buildings along Metro ROW:

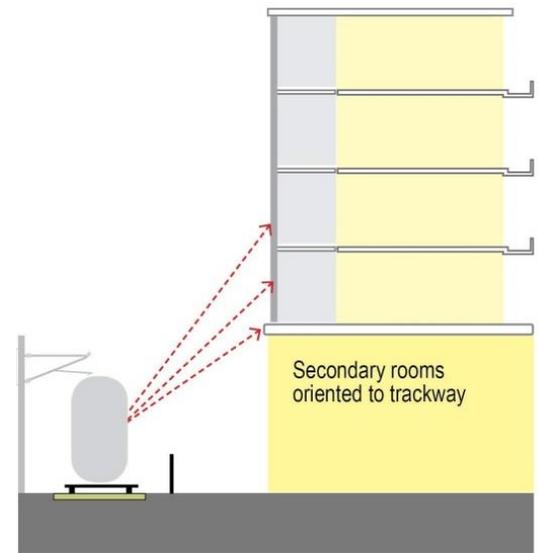
- Locate “back of house” rooms (e.g. bathrooms, stairways, laundry rooms) along ROW, rather than noise sensitive rooms (e.g. bedrooms and family rooms)
- Use upper level setbacks and locate living spaces away from ROW.
- Enclose balconies.
- Install double-pane windows.
- Include language disclosing potential for noise, vibration, and other impacts due to transit proximity in terms and conditions for building lease/sale agreements to protect building owners/sellers from tenant/buyer complaints.

Developers are responsible for any noise mitigation required, which may include engineering designs for mitigation recommended by Metro or otherwise required by local municipalities. A recorded *Noise Easement Deed* in favor of Metro may be required for projects within 100' of Metro ROW to ensure notification to tenants and owners of any proximity issues.

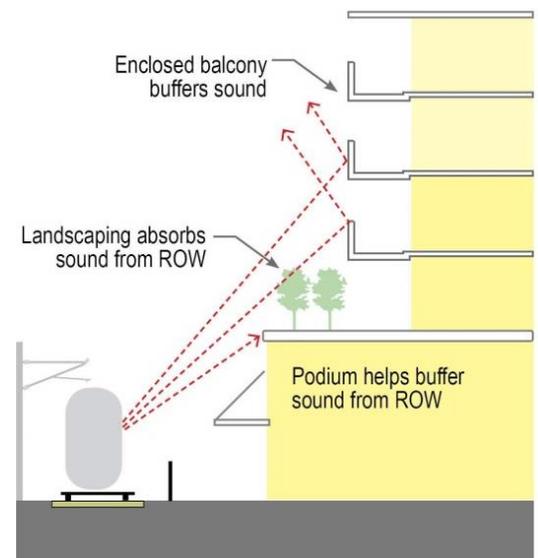
Additional Resources:

[Noise Easement Deed](#)

[MRDC, Section 2 – Environmental Considerations](#)



Building orientation can be designed to face away from tracks, reducing the noise and vibration impacts.



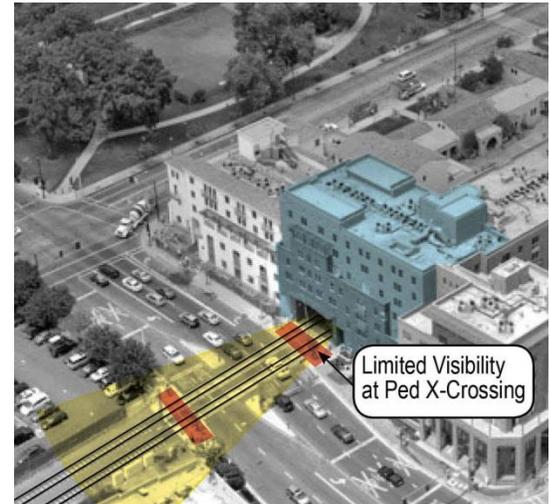
Strategic placement of podiums and upper-level setbacks on developments near Metro ROW can reduce noise and vibration impacts.



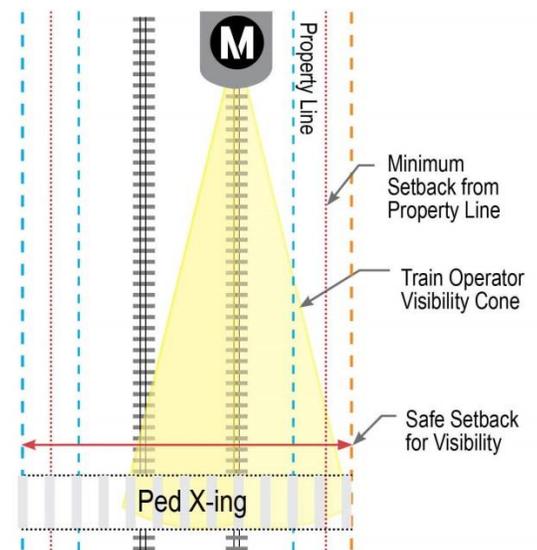
1.6 Sightlines at Crossings

Developments adjacent to Metro ROW can present visual barriers to transit operators approaching vehicular and pedestrian crossings. Buildings and structures in close proximity to transit corridors can reduce sightlines and create blind corners where operators cannot see pedestrians. This requires operations to reduce train speeds, which decreases the efficiency of transit service.

Recommendation: Design buildings to maximize transit service sightlines at crossings, leaving a clear *cone of visibility* to oncoming vehicles and pedestrians. Metro Operations will review, provide guidance, and determine the extent of operator visibility for safe operations. If the building envelope overlaps with the visibility cone near pedestrian and vehicular crossings, a building setback may be needed to ensure safe transit service. The cone of visibility at crossings and required setback will be determined based on vehicle approach speed.



Limited sightlines for trains approaching street crossings create unsafe conditions.



Visibility cones allow train operators to respond to safety hazards.

Additional Resources:

[MRDC, Section 4 – Guideway and Trackwork](#)

[MRDC, Section 12 – Safety, Security, & System Assurance](#)

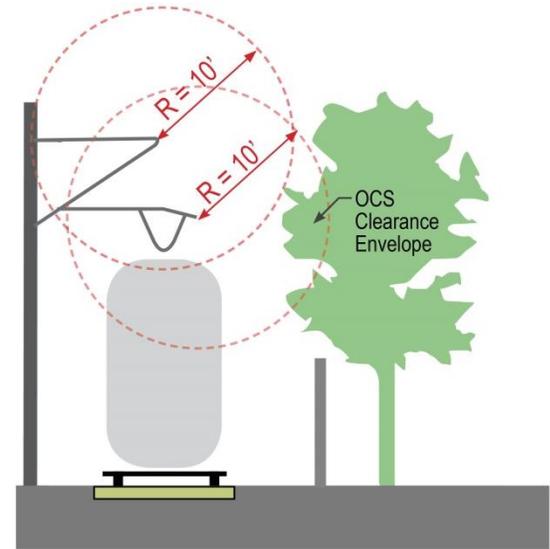


1.7 Transit Envelope Clearance

Metro encourages density along and around transit service as well as greening of the urban environment through the addition of street trees and landscaping. However, building appurtenances, such as balconies, facing rail ROW may pose threats to Metro service as clothing or other décor could blow into the OCS. Untended landscaping and trees can also grow into the OCS above light rail lines, creating electrical safety hazards as well as visual and physical impediments for trains.

Recommendation: Project elements facing or located adjacent to the ROW should be designed to avoid potential conflicts with Metro transit vehicles and infrastructure. Metro recommends that projects:

- Maintain building appurtenances and landscaping at a minimum distance of ten (10) feet from the OCS and support structures.
- Plan for landscape maintenance from private property and not allow growth into the Metro ROW. Property owners will not be permitted to access Metro property to maintain private development.
- Design buildings such that balconies do not provide direct access to ROW access.



Adjacent structures and landscaping should be sited to avoid conflicts with the rail OCS.

Additional Resources:

[MRDC, Section 4 – Guideway and Trackwork](#)

[MRDC, Section 6 – Architectural](#)

[MRDC, Section 12 – Safety, Security, & System Assurance](#)

1 Site Planning & Design



1.8 Bus Stops & Zones Design

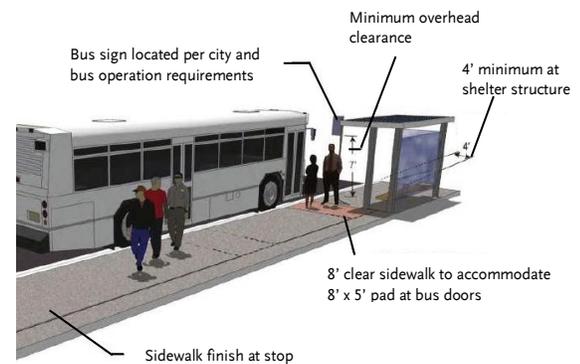
Metro Bus serves 15,967 bus stops throughout the diverse landscape that is Los Angeles County. Typically located on sidewalks within the public right-of-way owned and maintained by local jurisdictions, existing bus stop conditions vary from well-lit and sheltered spaces to uncomfortable and unwelcoming zones. Metro is interested in working with developers and local jurisdiction to create a vibrant public realm around new developments by strengthening multi-modal access to/from Metro transit stops and enhancing the pedestrian experience.

Recommendation: When designing around existing or proposed bus stops, Metro recommends project teams:

- Review Metro's Transit Service Policy: Appendix D, which provides standards for design and operation of bus stops and zones for near-side, far-side, and mid-block stops. In particular, adjacent projects should:
 - Accommodate 6' x 8' landing pads at bus doors.
 - Install a concrete bus pad within each bus stop zone to avoid asphalt damage.
- Replace stand-alone bus stop signs with bus shelters that include benches and adequate lighting.
- Design wide sidewalks (15' preferred) that accommodate bus landing pads as well as street furniture, landscape, and user travel space.
- Ensure final design of stops and surrounding sidewalk allows passengers with disabilities a clear path of travel.
- Place species of trees in quantities and spacing that will provide a continuous shade canopy in paths of travel to access transit stops. These must be placed far enough away from the curb and adequately maintained to prevent visual and physical impediments for buses when trees reach maturity.
- Locate and design driveways to avoid conflicts with on-street services and pedestrian traffic.

Additional Resources:

[Metro Transit Service Policy](#)



Well-designed and accessible bus stops are beneficial amenities for both transit riders and users of adjacent developments.



1.9 Driveways/Access Management

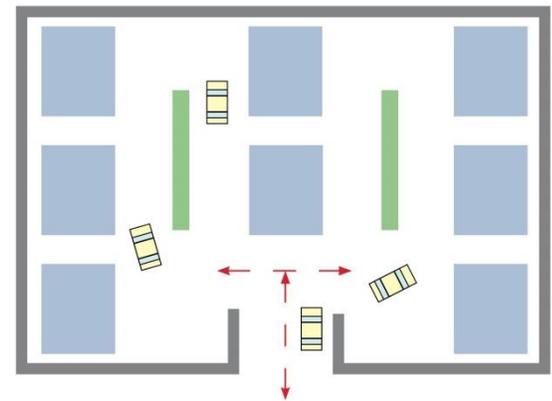
Driveways adjacent to on-street bus stops can create conflict for pedestrians walking to/from or waiting for transit. Additionally, driveways accessing parking and loading at project sites near Metro Rail and BRT crossings can create queuing issues along city streets and put vehicles in close proximity with fast moving trains and buses.

Recommendation: Metro encourages new developments to promote a lively public space mutually beneficial to the project and Metro by providing safe, comfortable, convenient, and direct connections to transit. Metro recommends that projects:

- Place driveways along side streets and alleys, away from on-street bus stops and transit crossings to minimize safety conflicts between active tracks, transit vehicles, and people, as well as queuing on streets.
- Locate vehicular driveways away from transit crossings or areas that are likely to be used as waiting areas for transit services.
- Program loading docks away from sidewalks where transit bus stop activity is/will be present.
- Consolidate vehicular entrances and reduce width of driveways.
- Raise driveway crossings to be flush with the sidewalk, slowing automobiles entering and prioritizing pedestrians.
- Separate pedestrian walkways to minimize conflict with vehicles and encourage safe non-motorized travel.



Driveways in close proximity to each other compromise safety for those walking to/from transit and increase the potential for vehicle-pedestrian conflicts.



A consolidated vehicular entrance greatly reduces the possibility for vehicle-pedestrian conflicts.

Additional Resources:

[Metro First/Last Mile Strategic Plan](#)
[MRDC, Section 3 – Civil](#)







2

Engineering

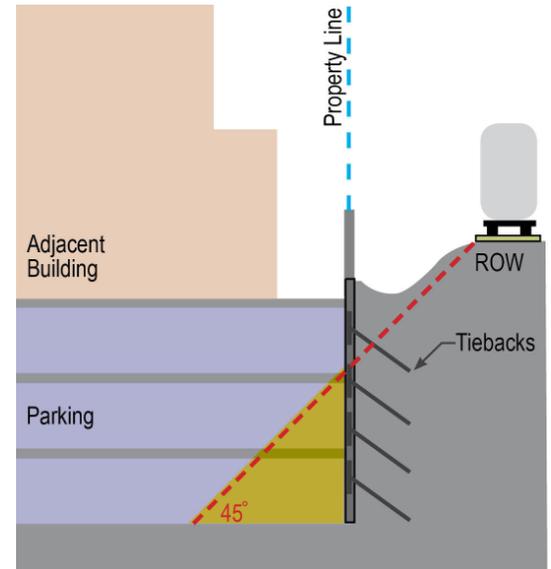


2.1 Excavation Support System Design

Excavation near Metro ROW has the potential to disturb adjoining soils and jeopardize the support of existing Metro infrastructure. Any excavation which occurs within the geotechnical *foul zone* is subject to Metro review and approval. The geotechnical zone of influence shall be defined as the area below the track-way as measured from a 45-degree angle from the edge of the rail track ballast. Construction within this vulnerable area poses a potential risk to Metro service and safety and triggers additional safety regulations.

Recommendation: Coordinate with Metro Engineering staff for review and approval of structural and support of excavation drawings prior to the start of excavation or construction. Tie backs encroaching into Metro ROW may require a tie back easement or license, at Metro's discretion.

Any excavation/shoring within Metrolink operated and maintained ROW would require compliance with Metrolink Engineering standards and guidelines.



An underground structure located within the ROW foul zone would require additional review by Metro.

Additional Resources:

[Metrolink Engineering & Construction Requirements](#)

[MRDC, Section 3 – Civil](#)

[MRDC, Section 5 – Structural/Geotechnical](#)



2.2 Proximity to Stations & Tunnels

Metro supports development of commercial and residential properties near transit services and understands that increasing development near stations represents a mutually beneficial opportunity to increase ridership and enhance transportation options for the users of the developments. However, construction adjacent to, over, or under underground Metro facilities (tunnels, stations and appendages) is of great concern and should be coordinated closely with Metro Engineering.

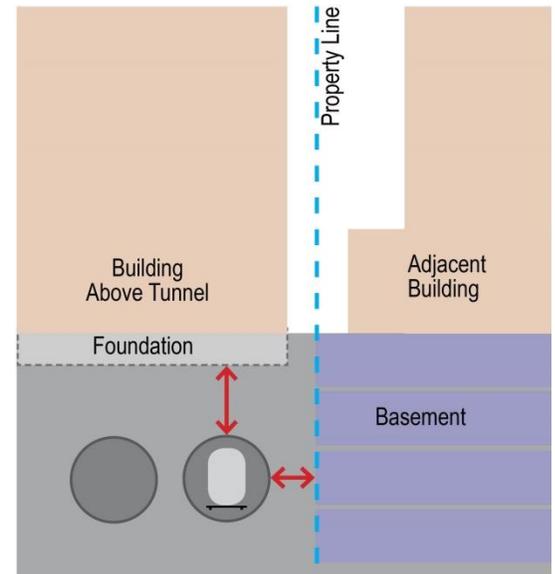
Recommendation: Dependent on the nature of the adjacent construction, Metro will need to review the geotechnical report, structural foundation plans, sections, shoring plan sections and calculations. Metro typically seeks to maintain a minimum eight (8) foot clearance from existing Metro facilities to new construction (shoring or tiebacks). It will be incumbent upon the developer to demonstrate, to Metro's satisfaction, that both the temporary support of construction and the permanent works do not adversely affect the structural integrity, safety or continued efficient operation of Metro facilities.

Metro may require monitoring where such work will either increase or decrease the existing overburden (i.e. weight) to which the tunnels or facilities are subjected. When required, the monitoring will serve as an early indication of excessive structural strain or movement. Additional information regarding monitoring requirements, which will be determined on a case-by-case basis, may be found in Section 3.4, Excavation Drilling/Monitoring.

Additional Resources:

[MRDC, Section 3 – Civil](#)

[MRDC, Section 5 – Structural/Geotechnical](#)



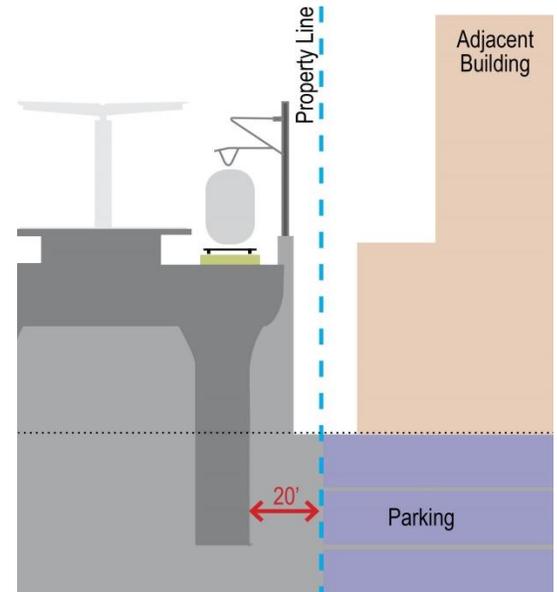
Underground tunnels in close proximity to adjacent basement structure.



2.3 Protection from Explosion/Blast

Metro is obligated to ensure the safety of public transit infrastructure from potential explosive sources which could originate from adjacent underground structures or from at grade locations, situated below elevated *guideways* or stations. Blast protection setbacks or mitigation may be required for large projects constructed near critical Metro facilities.

Recommendation: Avoid locating underground parking or basement structures within twenty (20) feet from an existing Metro tunnel or facility (exterior face of wall to exterior face of wall). Adjacent developments which are within this 20-foot envelope may be required to undergo a *Threat Assessment and Blast/Explosion Study* subject to Metro review and approval.



An underground structure proposed within twenty (20) feet of a Metro structure may require a threat assessment and blast/explosion study.

Additional Resources:

[Metro Adjacent Construction Design Manual](#)

[MRDC, Section 3 – Civil](#)

[MRDC, Section 5 – Structural/Geotechnical](#)







3

Construction Safety & Monitoring

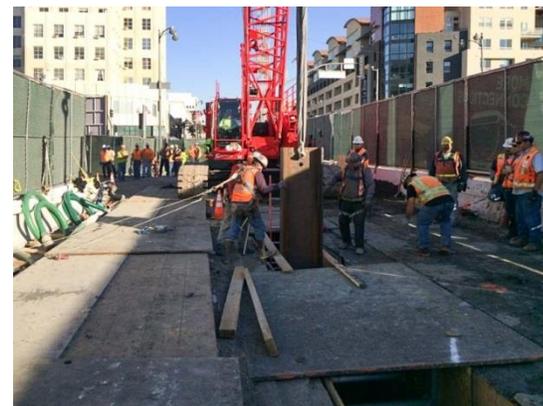
3 Construction Safety & Monitoring



3.1 Pre-Construction Coordination

Metro is concerned with impacts on service requiring single tracking, line closures, speed restrictions, and *bus bridging* occurring as a result of adjacent project construction. Projects that will require work over, under, adjacent, or on Metro property or ROW and include operation of machinery, scaffolding, or any other potentially hazardous work are subject to evaluation in preparation for and during construction to maintain safe operations and passenger wellbeing.

Recommendation: Following an initial screening of the project, additional coordination may be determined to be necessary. Dependent on the nature of the adjacent construction, developers may be requested to perform the following as determined on a case-by-case basis:



Metro staff oversees construction for the Purple Line extension.

- Submit a construction work plan and related project drawings and specifications for Metro review.
- Submit a contingency plan, show proof of insurance coverage, and issue current certificates.
- Provide documentation of contractor qualifications.
- Complete pre-construction surveys, perform baseline readings, and install movement instrumentation.
- Complete readiness review and perform practice run of shutdown per contingency plan.
- Confirm a ROW observer or other safety personnel and an inspector from the parties.
- Establish a coordination process for access and work in or adjacent to ROW for the duration of construction.

Project teams will be responsible for the costs of adverse impacts on Metro transit operations caused by work on adjacent developments, including remedial work to repair damage to Metro property, facilities, or systems. Additionally, a review fee may be assessed based on an estimate of required level of effort provided by Metro.

All projects adjacent to Metrolink infrastructure will require compliance with SCRRRA Engineering Standards and Guidelines.

Additional Resources:

[Metrolink Engineering & Construction Requirements](#)

[Metro Adjacent Construction Design Manual](#)

3 Construction Safety & Monitoring



3.2 Track Access and Safety

Permission is needed from Metro to enter Metro property for construction and maintenance along, above, or under Metro ROW as these activities can interfere with Metro utilities and service and pose a safety hazard to construction teams and transit riders. Track access is solely at Metro's discretion and is discouraged to prevent electrocution and collisions with construction workers or machines.

Recommendation: To work in or adjacent to Metro ROW, the following must be obtained and/or completed:

- **Right-of-Entry Permit/Temporary Construction Easement:** All access to and activity on Metro property, including easements necessary for construction of adjacent projects, must be approved through a Right-of-Entry Permit and/or a Temporary Construction Easement obtained from Metro Real Estate and may require a fee.
- **Track Allocation:** All work on Metro Rail ROW must receive prior approval from Metro Rail Operations Control. Track Allocation identifies, reserves, and requests changes to normal operations for a specific track section, line, station, location, or piece of equipment to allow for safe use by a non-Metro entity.
- **Safety Training:** All members of the project construction team will be required to attend Metro Safety Training in advance of work activity.
- **Construction Work Plan:** Dependent on the nature of adjacent construction, Metro may request a construction work plan, which describes means and methods and other construction plan details, to ensure the safety of transit operators and patrons.



Trained flaggers ensure the safe crossing of pedestrians and workers of an adjacent development.

Additional Resources:

[Metro Adjacent Construction Design Manual](#)

[Safety Training](#)

[Track Allocation](#)

3 Construction Safety & Monitoring



3.3 Construction Hours

To maintain public safety and access for Metro riders, construction should be planned, scheduled, and carried out in a way to avoid impacts to Metro service and maintenance. Metro may limit hours of construction which impact Metro ROW to night or off-peak hours so as not to interfere with Metro revenue service.

Recommendations: In addition to receiving necessary construction approvals from the local municipality, all construction work on or in close proximity to Metro ROW must be scheduled through the Track Allocation Process, detailed in Section 3.2.

Metro prefers that adjacent construction that has the potential to impact normal, continuous Metro operations take place during non-revenue hours (approximately 1:00a.m.-4:00a.m.) or during non-peak hours to minimize impacts to service. The project sponsor may be responsible for additional operating costs resulting from disruption to normal Metro service.



Construction during approved hours ensures the steady progress of adjacent development construction as well as performance of Metro's transit service.

Additional Resources:

[Metro Adjacent Construction Design Manual](#)

[MRDC, Section 10 – Operations](#)

[Track Allocation](#)

3 Construction Safety & Monitoring



3.4 Excavation/Drilling Monitoring

Excavation is among the most hazardous construction activities and can pose threats to the structural integrity of Metro's transit infrastructure.

Recommendation: Excavation and shoring plans adjacent to the Metro ROW shall be reviewed and approved by Metro Engineering prior to commencing construction.

Geotechnical instrumentation and monitoring will be required for all excavations occurring within Metro's *geotechnical zone of influence*, where there is potential for adversely affecting the safe and efficient operation of transit vehicles. Monitoring of Metro facilities due to adjacent construction may include the following as determined on a case-by-case basis:

- Pre- and post-construction condition surveys
- Extensometers
- Inclinometers
- Settlement reference points
- Tilt-meters
- Groundwater observation wells
- Movement arrays
- Vibration monitoring



Rakers and tiebacks provide temporary support during construction.



A soldier pile wall supports adjacent land during construction.

Additional Resources:

[Metro Adjacent Construction Design Manual](#)

[MRDC, Section 3 – Civil](#)

[MRDC, Section 5 – Structural/Geotechnical](#)

3 Construction Safety & Monitoring



3.5 Crane Operations

Construction activities adjacent to Metro ROW will often require moving large, heavy loads of building materials and machinery by cranes. Cranes referred to in this section include all power operated equipment that can hoist, lower, and horizontally move a suspended load. There are significant safety issues to be considered for the operators of crane devices as well as Metro patrons and operators.

Recommendations: Per California Occupational Safety and Health Administration (Cal/OSHA) standards, cranes operated near the OCS must maintain a twenty (20) foot clearance from the OCS. In the event that a crane or its load needs to enter the 20-foot envelope, OCS lines must be de-energized.

Construction activities which involve swinging a crane and suspended loads over Metro facilities or bus passenger areas shall not be performed during revenue hours. The placement and swing of this equipment are subject to Metro review and possible work plan.



Construction adjacent to the Pico Rail Station in Downtown Los Angeles.



Construction adjacent to the Chinatown Rail Station.

Additional Resources:

[Metro Adjacent Construction Design Manual](#)
[Cal/OSHA](#)

3 Construction Safety & Monitoring



3.6 Construction Barriers & Overhead Protection

During construction, falling objects can damage Metro facilities, and pose a safety concern to the patrons accessing them.

Recommendations: Vertical construction barriers and overhead protection compliant with Metro and Cal OSHA requirements shall be constructed to prevent objects from falling into the Metro ROW or areas designed for public access to Metro facilities. A protection barrier shall be constructed to cover the full height of an adjacent project and overhead protection from falling objects shall be provided over Metro ROW as necessary. Erection of the construction barriers and overhead protection for these areas shall be done during Metro non-revenue hours.



A construction barrier is built at the edge of the site to protect tracks from adjacent work.

Additional Resources:

[Metro Adjacent Construction Design Manual](#)

3 Construction Safety & Monitoring



3.7 Pedestrian & Emergency Access

Metro's ridership relies on the consistency and reliability of access and *wayfinding* to/from stations, stops, and facilities. Construction on adjacent developments must not obstruct fire department access, emergency egress, or otherwise present a safety hazard to Metro operations, its employees, patrons, and the general public. Fire access and safe escape routes within all Metro stations, stops, and facilities must be maintained.

Recommendations: The developer shall ensure pedestrian access to Metro stations, stops, and transit facilities is compliant with the Americans with Disabilities Act (ADA) and maintained during construction:

- Temporary fences, barricades, and lighting should be installed and watchmen provided for the protection of public travel, the construction site, adjacent public spaces, and existing Metro facilities.
- Temporary signage should be installed where necessary and in compliance with the latest California Manual on Uniform Traffic Control Devices and in coordination with Metro Art and Design Standards.
- Emergency exits shall be provided and be clear of obstructions at all times.
- Access shall be maintained for utilities such as fire hydrants, stand pipes/connections, and fire alarm boxes as well as Metro-specific infrastructure such as fan and vent shafts.



Sidewalk access is blocked for construction project, forcing pedestrians into street or to use less direct paths to the Metro facility.

Additional Resources:

[California Manual on Uniform Traffic Control Devices](#)

[Metro Adjacent Construction Design Manual](#)

[Metro Signage Standards](#)

3 Construction Safety & Monitoring



3.8 Impacts to Bus Routes & Stops

During construction, bus stops and routes may need to be temporarily relocated. Metro needs to be informed of activities that require removal and/or relocation in order to ensure uninterrupted service.

Recommendations: During construction, existing bus stops must be maintained or relocated consistent with the needs of Metro Bus Operations. Design of temporary and permanent bus stops and surrounding sidewalk area must be ADA-compliant and allow passengers with disabilities a clear path of travel to the transit service. Metro Bus Operations Control Special Events and Metro Stops & Zones Department should be contacted at least 30 days in advance of initiating construction activities



Temporary and permanent relocation of bus stops and layover zones will require coordination between developers, Metro, and other municipal bus operators, and local jurisdictions.

Additional Resources:

[Metro Transit Service Policy](#)
[MRDC, Section 3 – Civil](#)

3 Construction Safety & Monitoring



3.9 Utility Coordination

Construction has the potential to interrupt utilities that Metro relies on for safe operations and maintenance. Utilities of concern to Metro include but are not limited to: condenser water piping, potable/fire water, and storm and sanitary sewer lines, as well as electrical/telecommunication services.

Recommendations: Temporary and permanent utility impacts and relocation near Metro facilities should be addressed during project design and engineering to avoid conflicts during construction.

The contractor shall protect existing aboveground and underground Metro utilities during construction and coordinate with Metro to receive written approval for any utilities pertinent to Metro facilities that may be verified, used, interrupted, or disturbed.

When electrical power outages or support functions are required, the approval must be obtained through Metro Track Allocation.



Coordination of underground utilities is critical.

Additional Resources:

[Metro Adjacent Construction Design Manual](#)

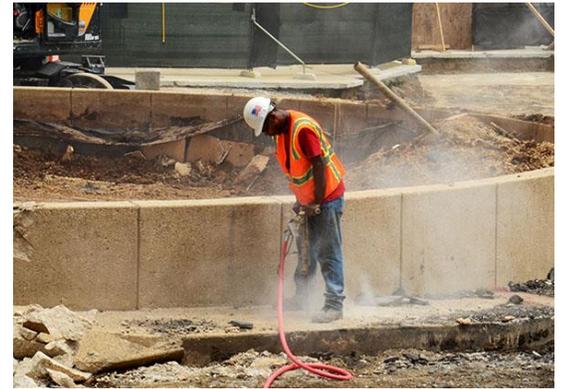
3 Construction Safety & Monitoring



3.10 Air Quality & Ventilation Protection

Hot or foul air, fumes, smoke, steam, and dust from adjacent construction activities can negatively impact Metro facilities, service, and users.

Recommendation: Hot or foul air, fumes, smoke, and steam from adjacent facilities must not be discharged within 40 feet of existing Metro facilities, including but not limited to: ventilation system intake shafts or station entrances. Should fumes be discharged within 40 feet of Metro intake shafts, a protection panel around each shaft shall be required.



A worker breaks up concrete creating a cloud of silica dust.

Additional Resources:

[Metro Adjacent Construction Design Manual](#)
[MRDC, Section 8 – Mechanical](#)

Resources

The following provides Metro contact information and a list of programs, policies, and online resources that should be considered when planning projects within 100 feet of Metro ROW – including underground easements – and in close proximity to non-revenue transit facilities and property:



Metro encourages developers and municipalities to leverage digital resources and data sets to maximize opportunities inherent in transit adjacency.

Metro Adjacent Development Contact Information & Resources

Please direct any questions to the Metro Adjacent Development team at:

- 213-418-3484
- DevReview@metro.net

Metro Adjacent Development Review Webpage:

<https://www.metro.net/projects/devreview/>

Metro Right-of-Way GIS Data

Metro maintains a technical resource website housing downloadable data sets and web services. Developers and municipalities should utilize available Metro right-of-way GIS data to appropriately plan and coordinate with Metro when proposing projects within 100' of Metro right-of-way:

<https://developer.metro.net/portfolio-item/metro-right-of-way-gis-data/>

Metro Design Criteria & Standards

Metro standard documents are periodically updated and are available upon request:

- Metro Adjacent Construction Design Manual
- Metro Rail Design Criteria (MRDC)
- Metro Rail Directive Drawings
- Metro Rail Standard Drawings
- Metro Signage Standards

Metrolink Standards & Procedures

Engineering & Construction

<https://www.metrolinktrains.com/about/agency/engineering--construction/>

Metro Policies & Plans

Active Transportation Strategic Plan, 2016

<https://www.metro.net/projects/active-transportation-strategic-plan/>

Complete Streets Policy, 2014

<https://www.metro.net/projects/countywide-planning/metros-complete-streets-policy-requirements/>

Countywide Sustainability Planning Policy & Implementation Plan, 2012

https://media.metro.net/projects_studies/sustainability/images/countywide_sustainability_planning_policy.pdf

First/Last Mile Strategic Plan, 2014

https://media.metro.net/docs/First_Last_Mile_Strategic_Plan.pdf

Transit Service Policy, 2015

https://media.metro.net/images/service_changes_transit_service_policy.pdf



Major construction at the Metrolink San Bernardino Station.



Metro Complete Streets Policy

Resources



Metro Bike Hub at Los Angeles Union Station

Metro Programs & Toolkits

Bike Hub

<https://bikehub.com/metro/>

Bike Share for Business

<https://bikeshare.metro.net/for-business/>

Green Places Toolkit

<https://www.metro.net/interactives/greenplaces/index.html>

Transit Oriented Communities

<https://www.metro.net/projects/transit-oriented-communities/>

Transit Passes

Annual and Business Access Passes

<https://www.metro.net/riding/eapp/>

College/Vocational Monthly Pass

<https://www.metro.net/riding/fares/collegevocational/>

Transit Supportive Planning Toolkit

<https://www.metro.net/projects/tod-toolkit/>

Useful Policies & Resources

ADA Standards for Accessible Design, 2010

U.S. Department of Justice.

https://www.ada.gov/2010ADASTandards_index.htm

California Manual on Uniform Traffic Control Devices.

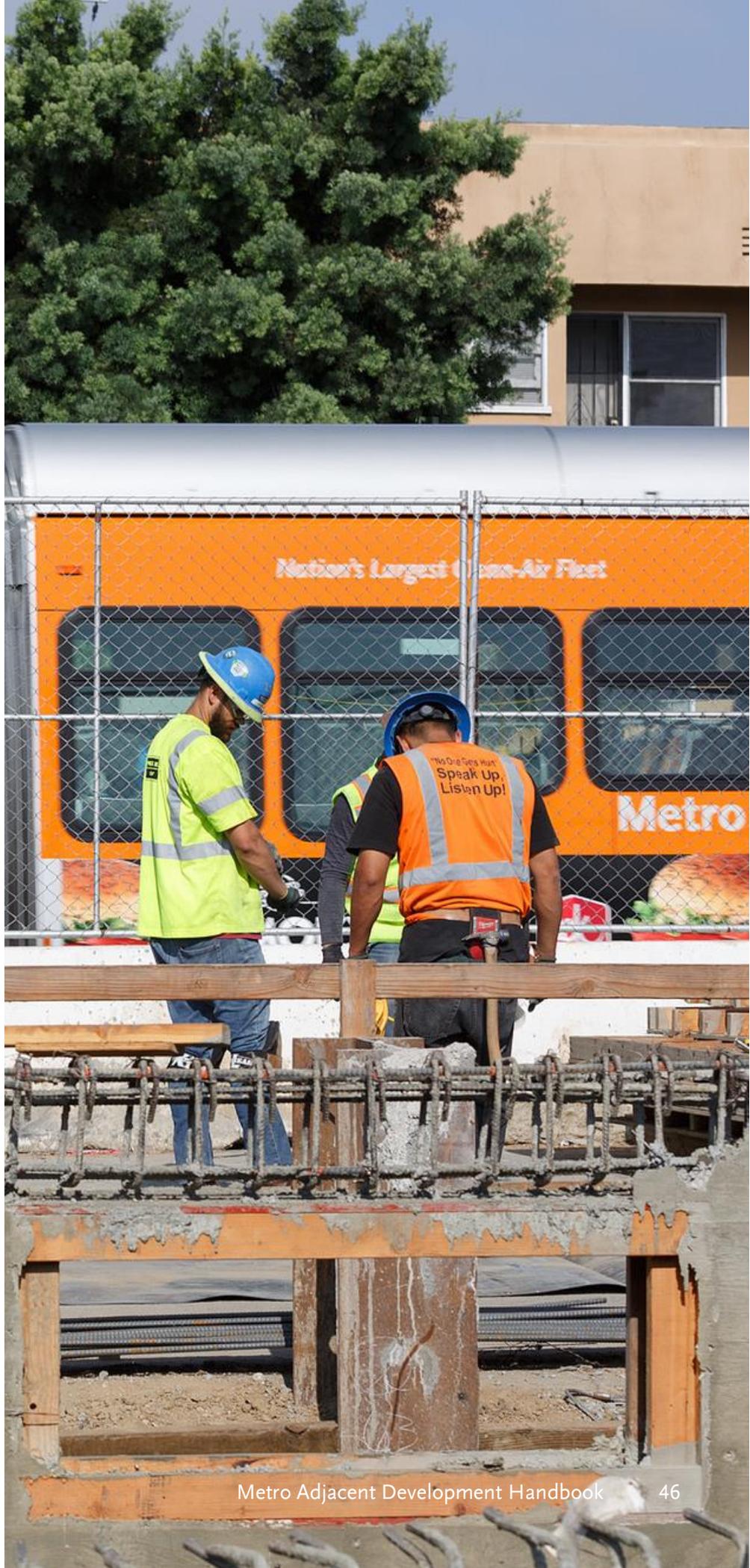
State of California Department of Transportation

<http://www.dot.ca.gov/trafficops/tcd/signcharts.html>

California Occupational Safety and Health Administration (Cal/OSHA)

State of California Department of Industrial Relations

<http://www.dir.ca.gov/dosh/>



Glossary

Cone of Visibility – a conical space at the front of moving transit vehicles allowing for clear visibility of travel way and/or conflicts.

Construction Work Plan (CWP) – project management document outlining the definition of work tasks, choice of technology, estimation of required resources and duration of individual tasks, and identification of interactions among the different work tasks.

Flagger/Flagman – person who controls traffic on and through a construction project. Flaggers must be trained and certified by Metro Rail Operations prior to any work commencing in or adjacent to Metro ROW.

Geotechnical Foul Zone – area below a track-way as measured from a 45-degree angle from the edge of the rail track ballast.

Guideway – a channel, track, or structure along which a transit vehicle moves.

Heavy Rail Transit (HRT) – Metro HRT systems include exclusive ROW (mostly subway) trains up to six (6) cars long (450') and utilize a contact rail for traction power distribution (e.g. Metro Red Line).

Light Rail Transit (LRT) – Metro LRT systems include exclusive, semi-exclusive, or street ROW trains up to three (3) cars long (270') and utilize OCS for traction power distribution (e.g. Metro Blue Line).

Measure R – half-cent sales tax for Los Angeles County approved in November 2008 to finance new transportation projects and programs. The tax expires in 2039.

Measure M – half-cent sales tax for LA County approved in November 2016 to fund transportation improvements, operations and programs, and accelerate projects already in the pipeline. The tax will increase to one percent in 2039 when Measure R expires.

Metrolink – a commuter rail system with seven lines throughout Los Angeles, Orange, Riverside, San Bernardino, Ventura, and North San Diego counties governed by the Southern California Regional Rail Authority.

Metro Adjacent Construction Design Manual – Volume III of the Metro Design Criteria & Standards which outlines the Metro adjacent development review procedure as well as operational requirements when constructing over, under, or adjacent to Metro facilities, structures, and property.

Metro Bus – Metro “Local” and “Rapid” bus service runs within the street, typically alongside vehicular traffic, though occasionally in “bus-only” lanes.

Metro Bus Rapid Transit (BRT) – high quality bus service that provides faster and convenient service through the use of dedicated ROW, branded vehicles and stations, high frequency and intelligent transportation systems, all door boarding, and intersection crossing priority. Metro BRT generally runs within the center of freeways and/or within dedicated corridors.

Metro Design Criteria and Standards – a compilation of documents that govern how Metro transit service and facilities are designed, constructed, operated, and maintained.

Metro Rail – urban rail system serving Los Angeles County consisting of six lines, including two subway lines (Red and Purple Lines) and four light rail lines (Blue, Green, Gold, and Expo Lines).

Metro Rail Design Criteria (MRDC) – Volume IV of the Metro Design Criteria & Standards which establishes design criteria for preliminary engineering and final design of a Metro Project.

Metro Transit Oriented Communities – land use planning and community development program that seeks to

maximize access to transportation as a key organizing principle and promote equity and sustainable living by offering a mix of uses close to transit to support households at all income levels, as well as building densities, parking policies, urban design elements and first/last mile facilities that support ridership and reduce auto dependency.

Noise Easement Deed – easement completed by property owners abutting Metro ROW acknowledging use and possible results of transit vehicle operation on the ROW.

Overhead Catenary System (OCS) – one or more electrified wires (or rails, particularly in tunnels) situated over a transit ROW that transmit power to light rail trains via pantograph, a current collector mounted on the roof of an electric vehicle. Metro OCS is supported by hollow poles placed between tracks or on the outer edge of parallel tracks.

Right of Entry Permit – written approval granted by Metro Real Estate to enter Metro ROW and property.

Right of Way (ROW) –the composite total requirement of all interests and uses of real property needed to construct, maintain, protect, and operate the transit system.

Southern California Regional Rail Authority (SCRRA) – a joint powers authority made up of an 11-member board representing the transportation commissions of Los Angeles, Orange, Riverside, San Bernardino and Ventura counties. SCRRA governs and operates Metrolink service.

Threat Assessment and Blast/Explosion Study – analysis performed when adjacent developments are proposed within twenty (20) feet from an existing Metro tunnel or facility.

Track Allocation/Work Permit – permit granted by Metro Rail Operations Control to allocate a section of track and perform work on Metro Rail ROW. This permit should be

submitted for any work that could potentially foul the envelope of a train.

Wayfinding – signs, maps, and other graphic or audible methods used to convey location and directions to travelers.



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