

# AIRFIELD & TERMINAL MODERNIZATION PROJECT

LOS ANGELES INTERNATIONAL AIRPORT (LAX)



FINAL ENVIRONMENTAL  
IMPACT REPORT (FINAL EIR)

## Attachment F3 Original Comment Letters on the Draft EIR



[State Clearinghouse No. 2019049020]

City of Los Angeles  
Los Angeles World Airports



August 2021



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# Attachment F3 – Original Comment Letters on the Draft EIR

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**From:** Lin, Alan S@DOT <alan.lin@dot.ca.gov>  
**Sent:** Monday, December 7, 2020 12:13 PM  
**To:** QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>; OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>  
**Subject:** SCH # 2019049020 Los Angeles International Airport Airfield

Attached please find Caltrans' comment letter.

Thank you!

Alan Lin, P.E.  
Transportation Engineer, Civil  
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State of California  
Department of Transportation  
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December 7, 2020

Ms. Evelyn Quintanilla  
City of Los Angeles  
Los Angeles World Airports (LAWA)  
P.O. Box 92216  
Los Angeles, CA 90009-2216

RE: Los Angeles International Airport Airfield  
and Terminal Modernization Project  
Vic. LA-405/PM 22.217,  
LA-01/PM 25.95-28.36  
SCH # 2019049020  
Ref. GTS # LA-2019-02403AL-NOP  
GTS # LA-2019-03403AL-DEIR

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 ("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 safety and operational management within the north airfield, new concourse and terminal facilities to upgrade passenger processing capabilities and enhance the passenger experience, and an improved system of roadways to better access the Central Terminal Area (CTA) and new facilities while reducing congestion. **Airfield Improvements (North Airfield):** Airfield safety and operational management would be enhanced with the westerly extension of Taxiway D and relocation and reconfiguration of runway exits from the northernmost runway. **New Terminal Facilities:** Concourse 0 would be a new easterly extension of Terminal 1. Terminal 9 would be a new passenger terminal located southeast of the Sepulveda Boulevard/Century Boulevard intersection. Taxiways in both the north and south airfields would be modified to provide aircraft access to Concourse 0 and Terminal 9. **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 be provided by a new station on the approved LAX Automated People Mover (APM) line with a pedestrian connection to Terminal 9. Other landside improvements associated with Terminal 9 include a pedestrian corridor between Terminals 8 and 9 that would bridge across Sepulveda Boulevard, and a parking facility.

Ms. Evelyn Quintanilla  
December 7, 2020  
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As a reminder, please consider integrating transportation and land use in a way that reduces VMT and Greenhouse Gas (GHG) emissions by facilitating the provision of more proximate goods and services to shorten trip lengths and achieve a high level of non-motorized travel and transit use.

Caltrans seeks to promote safe, accessible multimodal transportation. Methods to reduce pedestrian and bicyclist exposure to vehicles improves safety by lessening the time that the user is in the likely path of a motor vehicle. Caltrans recommends the project consider the use of methods such as, but not limited to, the construction of physically separated facilities such as sidewalks, raised medians, refuge islands, and off-road paths and trails, or a reduction in crossing distances through roadway narrowing.

Additionally, pedestrian and bicyclist warning signage, flashing beacons, crosswalks, signage and striping can be used to indicate to motorists that they should expect to see and yield to pedestrians and bicyclists. Visual indication from signage can be reinforced by road design features such as lane widths, landscaping, street furniture, and other design elements.

The main pedestrian connection to LAX is via Century Blvd. Sidewalks and crosswalks are located on the north and south side of Century Blvd. between I-405 and World Way. A gap in the sidewalk exists on the south side of Century Blvd. between World Way and Avion Drive. Landscaped buffers between the roadway and the pedestrian walkway are located on both sides of the street between Avion Drive and Aviation Blvd.

City of Los Angeles Mobility Plan 2035 has identified future planned bicycle facilities along segments of Lincoln Blvd., South La Tijera Blvd, Westchester Parkway, and Manchester Ave. in the vicinity of the Project area. In addition, the LAX landside Access Modernization Program includes additional modifications to the bike facilities in the Project area including removing existing bike lane on 96<sup>th</sup> Street between new Jetway Blvd. and Airport Blvd. and construction of a combination bike lane and multi-use paths for shared use by pedestrians and bicyclists. Bike facilities will include: bike lanes on Westchester Blvd. from new Jetway Blvd. to Airport Blvd. and on Airport Blvd. from Arbor Vitae Street to Century Blvd; striped bike paths along new Jetway Blvd. from Arbor Vitae Street to Century Blvd. and along new 94<sup>th</sup> Street from new Jetway Blvd. to Airport Blvd.; and a multi-use path on the south side of Century Blvd. between Airport Blvd. and Aviation Blvd., continuing north on the west side of Aviation Blvd. and turning west along the south side of Arbor Vitae Street to La Cienega Blvd.

Fifteen bus lines currently serve the LAX City Bus Center and the Metro Green Line Aviation/LAX Station. Seven bus lines are operated by Metro, two bus lines are operated by the Culver City Bus (CC), two bus lines are operated by Santa Monica Big Blue Bus (SM), two bus lines are operated by LADOT Commuter Express (CE), one bus line is operated by Torrance Transit (TT), and one bus line is operated by the City

Ms. Evelyn Quintanilla  
 December 7, 2020  
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of Redondo beach – Beach Cities Transit (BCT). In addition, the LAX FlyAway serves the CTA. There are also dozens of other transit lines that connect to the Metro green Line and are, therefore, accessible to LAX via one transfer at a Metro Green Line station.

On page 4.8-41 of the Draft EIR, the Table 4.8-10 Summary of Projected VMT for Existing Conditions, Projected Future Conditions Baseline (2028), and Proposed Project (2028) indicated the Existing Conditions (2019)/Projected Future Conditions Baseline (2028)/Proposed Project (2028) for the total Passenger VMT is 6,581,811/8,676,209/8,708,995 respectively, and for the VMT per Employee is 25.2/24.0/23.9 respectively.

As shown in Table 4.8-13 on page 4.8-51 (Repeated table from Table 4.8-10), VMT per employee under Projected Future Conditions Baseline (2028) will be more efficient than under existing (2029) conditions. We concur that this is primarily due to planned improvements to transit (e.g., opening of the Crenshaw/LAX Line) and improvements associated with Phase 1 of the LAX Landside Access Modernization Program, including new roadways, the APM, ITF West, ITF Fast, and CONRAC, as well as travel demand management (TDM) measures. These changes will result in an improved efficiency metric of 24 VMT per employee (compared to 25.2 under existing conditions).

The addition of the proposed Project would result in changes to the parking destination for some existing and new Project employees, which would slightly improve the VMT per employee rate. As shown in Table 4.8-13, the Project would result in 23.9 VM per employee. Although this would be a decrease compared to Projected Future Conditions Baseline (2008), the decrease would not be at least 15 percent below the baseline (i.e., 20.4), which is the threshold of significance. Because the proposed Project would generate VMT per employee that would exceed 15 percent below the Projected Future Conditions Baseline (2028) VMT per employee rate, this would be a significant impact.

The project proposed the following mitigation measures as MM-T (ATMP)-1 VMT Reduction Program:

- Expand LAWA's Rideshare Program
- Formalize Employee Telecommuting Program
- Provide On-demand Micro-Transit Shuttle
- Market and Promote Alternative Transportation Options
- Conduct Parking Study to Price Parking to Reduce VMT
- Expand Incentives and Commuter Benefits
- Evaluate Modifications to FlyAway Service
- Explore Incentive Measures from LAWA Mobility Strategy Plan
- Evaluate the Potential for Congestion Pricing in the CTA
- Annual Monitoring and Reporting



Ms. Evelyn Quintanilla  
December 7, 2020  
Page 4 of 4

We concur that with implementation of Mitigation Measure MM-T (ATMP)-1, the significant impact related to employment VMT would be reduced to a less than significant impact. The proposed Project would result in a net increase of 32,786 total passenger VMT over the Projected Future Conditions Baseline (2028). This would be a significant impact. Even with mitigation, this would remain a significant and unavoidable impact. The proposed Project would induce an additional 18,220 VMT compared to the Projected Future Conditions Baseline (2028). This would be a significant impact. There are no feasible mitigation measures for this impact. As such, it would be a significant and unavoidable impact.

The proposed improvements: 1) to construct above-grade access ramps at Sepulveda Blvd and Century Blvd to facilitate traffic flow in and around LAX, 2) to remove the cloverleaf ramps at the intersection of Sepulveda Blvd and Century Blvd, along with the elimination of the free right-turn lane on southbound Sepulveda Blvd to westbound CTA and eastbound World Way onto southbound Sepulveda Blvd., 3) to remove access point from World Way to southbound Sepulveda Blvd and reroute to the new above-grade ramps, 4) to construct an above-grade pedestrian bridge at Sepulveda Blvd and Century Blvd., would need to be oversight by Caltrans.

The new signalized intersections at Sepulveda Blvd. (SR-01) and 96<sup>th</sup> Street would require performing Intersection Control Evaluation (ICE).

For this project, transportation of heavy construction equipment and/or materials, which requires the use of oversized-transport vehicles on State highways, will require a transportation permit from Caltrans. It is recommended that large size construction/operation truck trips be limited to off-peak commute periods and idle time not to exceed 10 minutes.

If you have any questions, please feel free to contact Mr. Alan Lin the project coordinator at (213) 897-8391 and refer to GTS # LA-2020-03403AL-DEIR.

Sincerely,



MIYA EDMONSON  
IGR/CEQA Branch Chief

email: State Clearinghouse

---

**From:** David Leger <davidl@southbaycities.org>  
**Sent:** Tuesday, November 10, 2020 2:28 PM  
**To:** QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>  
**Subject:** SBCCOG ATMP DEIR Comment Extension Request

Dear Ms. Quintanilla,

The South Bay Cities Council of Governments (SBCCOG) requests an extension of the deadline for public comments on LAWA's Airfield & Terminal Modernization Project draft EIR. Attached is a letter from SBCCOG Chair, Hawthorne Councilmember Olivia Valentine, detailing the request.

Should you have any questions, please contact SBCCOG Executive Director, Jacki Bacharach, at (310) 524-2301 or [Jacki@southbaycities.org](mailto:Jacki@southbaycities.org)

Sincerely,

**David Leger**

Analyst & Assistant Board Secretary

(310) 371-7222 ext. 202

South Bay Cities Council of Governments





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[www.southbaycities.org](http://www.southbaycities.org)

November 10, 2020

Evelyn Quintanilla  
Chief of Airport Planning II  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

**RE: Request to Extend Deadline for Public Comment on the LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report**

Dear Ms. Quintanilla:

The South Bay Cities Council of Governments (SBCCOG) requests an extension of the deadline for public comments on the Los Angeles International Airport Airfield & Terminal Modernization Project Draft Environmental Impact Report ("DEIR"). Public comments on the DEIR are currently due on December 14, 2020, a deadline which is the statutory minimum. The SBCCOG believes that the deadline should be extended to April 30, 2021 to give the public a full 180 days from the October 29, 2020 release date in which to prepare comments on the DEIR.

The size of the DEIR and the magnitude of the project itself makes the current 45 day deadline which is also during the Thanksgiving holiday totally insufficient. The project, which includes two brand-new passenger terminals, multiple taxiway and other airfield improvements, and substantial on- and off-airport roadway improvements, has complex environmental impacts that require significant time to thoroughly review. Additionally, just as the coronavirus pandemic impacted LAWA's schedule in preparing the DEIR, the ongoing public health emergency also impacts the public's ability to meaningfully comment on the almost-750-page document in a timely manner. For these reasons, the SBCCOG believes the timeframe provided is insufficient to allow agencies, impacted adjacent residents and communities to review and respond to the DEIR for this regionally significant project.

Thank you for your consideration of this request. Should you have any questions, please do not hesitate to contact SBCCOG Executive Director Jacki Bacharach at (310) 524-2301 or [jacki@southbaycities.org](mailto:jacki@southbaycities.org).

Sincerely,

Olivia Valentine, SBCCOG Chair  
Councilmember, City of Hawthorne

LOCAL GOVERNMENTS IN ACTION

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita  
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills  
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** Fw: Addition to Our LAX Comment Form: Notification  
**Date:** Friday, February 26, 2021 1:49:02 PM

---

**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Friday, February 26, 2021 1:17:09 PM  
**To:** CRUZ, OHASSY C.  
**Subject:** Addition to Our LAX Comment Form: Notification



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

Changes since 2/26/21 1:15 PM

- 1 row added
- 1 attachment added

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

Row 70

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 70  |
| <b>Full Name</b>     | Jacki Bacharach   |
| <b>Company Name</b>  | South Bay Cities Council of Governments   |
| <b>Email Address</b> | Davidl@southbaycities.org   |
| <b>Comments</b>      | On behalf of the South Bay Cities Council of Governments Board of Directors, attached is a comment letter on the ATMP Draft EIR |
| <b>Created</b>       | 02/26/21 1:15 PM  |
| <b>Project</b>       | ATMP-Draft EIR  |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)



1 attachment added



[02.2021 LAX ATMP EIR comment letter final.pdf \(155k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 70: Jacki Bacharach



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February 25, 2021

Evelyn Quintanilla  
Chief of Airport Planning II  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

RE: South Bay Cities Council of Governments Comments on the LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report

Dear Ms. Quintanilla:

The South Bay Cities Council of Governments (SBCCOG) has reviewed Los Angeles World Airport's (LAWA) draft Environmental Impact Report (EIR) for the proposed LAX Airfield & Terminal Modernization Project (ATMP) and is raising the following concerns that should be addressed in the Final Draft and Response to Comments:

1. **Enhanced regionalization.** The SBCCOG strongly supports prioritizing efforts to regionalize air traffic to other existing airports such as Ontario International Airport, Burbank Airport and John Wayne Airport, and to support efforts to develop facilities in other areas. As the world begins to emerge from the COVID-19 pandemic and as air traffic begins to return to pre-pandemic levels, there should be a concerted effort to encourage regionalization. Airport officials must begin looking into ways that will encourage major air carriers of both passenger and cargo loads to return to Los Angeles' regional airports, not only LAX. There have been earlier efforts made at regionalization, including as part of a 2006 court settlement over expansion plans at LAX. However, those efforts largely never materialized and have not been revisited in the 15 years since major populations now live in the outlying areas around the regional airports. Now is the time to partner with other airports, LA City, LA County, adjacent counties, local leaders, and communities to work toward truly regionalizing the air traffic coming into the greater Los Angeles region. Regionalization will not only help minimize the impacts of growth on one particular area but will also help expand the economic benefits of increased air traffic to communities who may not have previously benefitted and provide much greater convenience for large areas of the population of the region. The SBCCOG looks forward to working with LAWA and other stakeholders on this endeavor.

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LOCAL GOVERNMENTS IN ACTION

Carson El Segundo Gardena Hawthorne Hermosa Beach Inglewood Lawndale Lomita  
Manhattan Beach Palos Verdes Estates Rancho Palos Verdes Redondo Beach Rolling Hills  
Rolling Hills Estates Torrance Los Angeles District #15 Los Angeles County

- 2. Growth Projections.** Although both SCAG and LAWA project air traffic growth at LAX regardless of the ATMP, it behooves all stakeholders to evaluate the long-term impacts of COVID-19 on previous growth projections. Even though the current downturn in air traffic will likely rebound in the coming years, it is important to evaluate the long-term behavioral changes accelerated by the pandemic. For example, population centers may shift inland in the next 25 years due to the ability to work remotely and business travel may not return to previous levels.

Additionally, it is imperative that evaluations be done to study if growth forecasts for other regional airports such as Ontario International, can accommodate their planned growth without additional infrastructure investments. Growth at Ontario will likely not perform to forecast levels if that facility cannot accommodate the additional air traffic, which could have long-lasting negative impacts on efforts at regionalization. If significant infrastructure expansion is needed to facilitate that growth, implementation of those improvements must be a top priority of the region. Otherwise, the ATMP will by default induce growth at LAX because the other airports will not be able to accommodate their increasing traffic and airlines will choose to go back to LAX because it will have the capacity and new facilities.

The SBCCOG remains concerned that although LAWA and SCAG projections forecast growth at LAX regardless of the project, the ATMP will significantly accelerate that growth on a timeline that outpaces any required infrastructure improvements. When a new lane is added to a freeway, that additional capacity is always considered growth inducing. Studies have shown that adding capacity to roadways encourages additional use of those facilities. The SBCCOG continues to have reservations about LAWA's denial that the proposed improvements are not inducing growth.

- 3. Traffic Impacts to the South Bay.** The SBCCOG believes that the draft EIR does not adequately evaluate impacts to motorists coming from the South Bay. Although CEQA may not require it, LAWA should not use the Vehicle Miles Traveled standard to avoid responsibility for the increased congestion on the critical thoroughfares that will directly result from this large airport expansion. In particular, LAWA should work with other stakeholders such as the SBCCOG, LA Metro, Caltrans, and surrounding cities who have been working together to identify freeway improvements and can do so again to address off site roadway mitigation improvements necessitated by this project. Even though LAWA may be subject to restrictions by the FAA on paying for these off-facility improvements, the impacts to these facilities occur, nonetheless. For example, it may prove beneficial for LAWA to work with other implementing agencies to address the

Century Boulevard exit on the northbound I-405 to allow motorists to head west on Century Boulevard without the need for a traffic signal.

4. **Terminal 9.** The SBCCOG thanks LAWA for committing to eliminate permanent access from Sepulveda Boulevard to T9. However, temporary access remains a possibility if the Terminal opens before the aerial roadway system is complete. We feel strongly that temporary access from Sepulveda Blvd is unwise. If merging movements within the Sepulveda tunnel are already bad, they will continue with a temporary access to T9 and might be even more confusing. There will already be access to T9 via Century Blvd and the new Jet Way street which are not dependent on the construction of the aerial roadway and they should alleviate the need for temporary access from Sepulveda, particularly given the burden it will cause on the traffic traveling through the tunnel. We urge you to commit to eliminating any access from Sepulveda Blvd at any time to Terminal 9. Temporary access is costly and unsafe as you have already recognized by eliminating the permanent access from Sepulveda. If a third access to Terminal 9 is deemed necessary, then we would ask that you delay the opening of Terminal 9 until the aerial roadway system is completed.

Thank you for providing an opportunity to comment on this draft EIR. Should you have any questions, please feel free to contact SBCCOG Executive Director, Jacki Bacharach, at 310-371-7222 or [Jacki@southbaycities.org](mailto:Jacki@southbaycities.org).

Sincerely,



Olivia Valentine, SBCCOG Chair  
Mayor Pro Tem, City of Hawthorne

**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Friday, March 12, 2021 4:09:21 PM



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

Changes since 3/12/21 4:07 PM

- 1 row added
- 1 attachment added

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

Row 75

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 75   |
| <b>Full Name</b>     | Lijin Sun  |
| <b>Company Name</b>  | South Coast Air Quality Management District  |
| <b>Email Address</b> | lsun@aqmd.gov  |
| <b>Comments</b>      | Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report for the proposed Los Angeles International Airport Airfield and Terminal Modernization Project (State Clearinghouse No.: 2019049020) (South Coast AQMD Control Number: LAC201029-01). Please contact me if you have any questions. |
| <b>Created</b>       | 03/12/21 4:07 PM   |
| <b>Project</b>       | ATMP-Draft EIR   |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

1 attachment added

[LAC201029-01 DEIR Airfield and Terminal Modernization](#)

[Project\\_20210312.pdf \(296k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 75: Lijin Sun



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**From:** Lijin Sun <LSun@aqmd.gov>

**Sent:** Friday, March 12, 2021 4:06 PM

**To:** QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>

**Subject:** South Coast AQMD Staff's Comments on Draft Environmental Impact Report for the Los Angeles International Airport Airfield and Terminal Modernization Project

Dear Ms. Quintanilla,

Attached are South Coast AQMD staff's comments on the Draft Environmental Impact Report for the proposed Los Angeles International Airport Airfield and Terminal Modernization Project (State Clearinghouse No.: 2019049020) ([South Coast AQMD Control Number: LAC201029-01](#)). The original comment letter will be submitted online at [www.lawa.org/ATMP](http://www.lawa.org/ATMP). Please contact me if you have any questions.

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 building is closed to the public. Thank you.*



# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND ONLINE:

March 12, 2021

[EQuintanilla@lawa.org](mailto:EQuintanilla@lawa.org)

[www.lawa.org/ATMP](http://www.lawa.org/ATMP)

Evelyn Quintanilla, Chief of Airport Planning II  
Los Angeles World Airports  
6053 Century Boulevard, Suite 1050  
Los Angeles, California 90045

**Draft Environmental Impact Report (Draft EIR) for the Proposed  
Los Angeles International Airport Airfield and Terminal Modernization Project  
(Proposed Project) (State Clearinghouse No.: 2019049020)**

South Coast Air Quality Management District (South Coast AQMD) staff appreciates the opportunity to comment on the above-mentioned document. Los Angeles World Airports (LAWA) is the California Environmental Quality Act (CEQA) Lead Agency for the Proposed Project. The following comments include recommended revisions to the CEQA baseline and air dispersion modeling, and information regarding South Coast AQMD permits for stationary equipment that should be included in the Final EIR.

Based on the Draft EIR, the Proposed Project consists of airfield, terminal, and landside improvements at Los Angeles International Airport (LAX)<sup>1</sup>. As part of LAWA's continuing commitment to maintain LAX as a world-class airport, the improvements include an 11-gate concourse facility, a 12-gate terminal, an automated people mover station, a pedestrian bridge, runway reconfiguration, and removal of remote gates<sup>2</sup>. Construction of the Proposed Project will occur in a six-year period from 2022-2028<sup>3</sup>. It is anticipated that operation will begin in 2028<sup>4</sup>.

Based on a review of the Draft EIR and supporting technical documents, South Coast AQMD staff has three main comments. A summary of these comments is provided as follows with additional details provided in the attachment.

1. **CEQA Baseline:** The Draft EIR calculates the Proposed Project's operational emissions and uses the comparison between the operational emissions at the expected buildout conditions (year 2028) and those at the existing conditions (year 2018) to determine the significance level for the Proposed Project's operational air quality impacts. This comparison might have improperly credited the Proposed Project with emission reductions associated with on-road mobile sources that will occur independent of the Proposed Project due to federal and state rules and regulations on clean vehicles and fuel technologies. The Final EIR should use the comparison between the operational emissions in year 2028 with the Proposed Project and the

<sup>1</sup> Draft EIR. Section 1, Introduction and Executive Summary. Page 1-1.

<sup>2</sup> *Ibid.* Page 1-5.

<sup>3</sup> Draft EIR. Section 2, Description of the Proposed Project. Pages 2-77 to 79.

<sup>4</sup> *Ibid.*

emissions in the same year without the Proposed Project to determine the level of significance for the Proposed Project's air quality impacts.

2. Air Dispersion Modeling Parameter: The Draft EIR states that sensitive receptors locations were determined in a manner that would identify peak ambient air pollutant impacts associated with the Proposed Project<sup>5</sup>. However, the receptor grid that was used in the air dispersion modeling was focused only on the fenceline and might not have been large enough to identify the maximum off-site concentrations. The Final EIR should provide additional information to justify the receptor grid used or perform additional modeling with an expanded receptor grid.
3. Responsible Agency and South Coast AQMD Permits: The Proposed Project will use rock crushing equipment during construction, and emergency generators, fire hydrant technologies, and fuel storage tanks during operation. If permits from South Coast AQMD are required, South Coast AQMD should be identified as a Responsible Agency in the Final EIR.

South Coast AQMD staff is available to work with LAWA to address any air quality questions that may arise from this comment letter. Please feel free to contact me at [lsun@aqmd.gov](mailto:lsun@aqmd.gov), if you have questions or wish to discuss the comments.

Sincerely,

*Lijin Sun*

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment  
JW:LS/MI  
LAC201029-01  
Control Number

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<sup>5</sup> *Ibid.* Section 4.1.1, Air Quality. Page 4.1.1-14.

## ATTACHMENT

**South Coast AQMD Staff's Summary of the Air Quality Analysis and Health Risk Assessment**

The Draft EIR quantifies the Proposed Project's regional construction emissions, which includes both direct emissions from construction activities and indirect emissions that would occur as a result of temporary runway closures, and the emissions are compared to South Coast AQMD's regional CEQA air quality significance thresholds. Based on the analysis, the Proposed Project's mitigated construction emissions from nitrogen oxides (NO<sub>x</sub>), volatile organic compounds (VOCs), carbon monoxide (CO), and sulfur oxides (SO<sub>x</sub>) would be significant and unavoidable at 805 pounds per day (lbs/day), 385 lbs/day, 4,394 lbs/day, and 173 lbs/day, respectively<sup>6</sup>. The Draft EIR includes a comparison between the Proposed Project's criteria pollutants emissions in 2028 and the emissions in 2018 to determine the level of significance for the Proposed Project's regional operational air quality impacts<sup>7</sup>. Based on the analysis, the Proposed Project's mitigated regional operational emissions from NO<sub>x</sub>, SO<sub>x</sub>, particulate matter (PM<sub>10</sub>), and fine particulate matter (PM<sub>2.5</sub>) would be significant and unavoidable at 2,509 lbs/day, 495 lbs/day, 658 lbs/day, and 178 lbs/day, respectively<sup>8</sup>. According to the Draft EIR, the Proposed Project would result in a maximum of 1-hour nitrogen dioxide (NO<sub>2</sub>) concentration of 264 micrograms per cubic meter (µg/m<sup>3</sup>) during construction and 336 µg/m<sup>3</sup> during operation<sup>9,10</sup>. The Proposed Project's operational PM<sub>10</sub> concentrations based on a 24-hour average and an annual average would be 6.2 µg/m<sup>3</sup> and 3.7 µg/m<sup>3</sup>, respectively<sup>11</sup>. The Draft EIR includes a health risk assessment (HRA) and states that the Proposed Project would result in a decrease in cancer inhalation risk of 1 in one million during construction and a decrease in cancer inhalation risk of 4 in one million during operation<sup>12,13</sup>, which would not exceed South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk<sup>14</sup>.

South Coast AQMD staff's detailed comments on the Draft EIR are provided as follows.

<sup>6</sup> Draft EIR. Section 4.1.1. Page 4.1.1-40.

<sup>7</sup> *Ibid.* Page 4.1.1-34.

<sup>8</sup> *Ibid.* Page 4.1.1-45.

<sup>9</sup> *Ibid.* Pages 4.1.1-51 and 52.

<sup>10</sup> Based on the air dispersion modeling that was performed to analyze the Proposed Project's localized air quality impacts, LAWA found that the Proposed Project would result in NO<sub>2</sub> concentration of 0.027 (1-hour) and 0.264 (annual) parts per million (ppm) during construction and 0.033 (1-hour) and 0.336 (annual) ppm during operation. (Draft EIR. Section 4.1.1. Page 4.1.1-51 and 52). In the Appendix I: *Health Effects* of the 2016 AQMP, South Coast AQMD staff discussed a 2016 health study by the U.S. EPA. The study found that when adults with asthma are exposed to NO<sub>2</sub> at the 100 parts per billion (ppb) to 300 ppb concentrations, they experienced an increase in airway responsiveness, which in asthmatics can worsen symptoms and reduce lung function. (Page I-54. Accessed at: <https://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/2016-air-quality-management-plan/final-2016-aqmp/appendix-i.pdf>).

<sup>11</sup> Draft EIR. Section 4.1.1. Page 4.1.1-52.

<sup>12</sup> *Ibid.* Appendix C: Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy. Section 4: Protocol for Conducting an Air Quality Impact Analysis of Criteria Pollutants. Page 4-4.

<sup>13</sup> HRA based on a 30-year adult residential exposure scenario used to determine significance. *Ibid.* Page 4-6.

<sup>14</sup> South Coast AQMD's CEQA significance threshold of 10 in one million for cancer risk is based on the most current methodology recommended by the California Office of Environmental Health Hazard assessment.

## 1. CEQA Baseline

Under CEQA, baseline conditions exist at the time of the environmental review is initiated or as they exist at the time the Notice of Preparation (NOP) is published, if there is a published NOP. Notwithstanding this general rule, the Lead Agency has the discretion to define the existing physical conditions, supported by substantial evidence. To facilitate an EIR's role as an informational document, the use of future baseline is proper in some cases. "Thus, an agency may forego analysis of a project's impacts on existing environmental conditions if such an analysis would be uninformative or misleading to decision makers and the public." (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439). (See also CEQA Guidelines Section 15125(a)(2)). Consideration of future conditions in determining whether a project's impacts may be significant is consistent with CEQA's rules regarding baseline, especially when the project has a long-term buildout schedule. "[N]othing in CEQA law precludes an agency ... from considering both types of baseline—existing and future conditions—in its primary analysis of the project's significant adverse effects." (*Neighbors for Smart Rail*, supra, 57 Cal.4th 439, 454). "Even when a project is intended and expected to improve conditions in the long term—20 or 30 years after an EIR is prepared—decision makers and members of the public are entitled under CEQA to know the short- and medium-term environmental costs of achieving that desirable improvement. ... [¶] ... The public and decision makers are entitled to the most accurate information on project impacts practically possible, and the choice of a baseline must reflect that goal." (See also *Communities for a Better Environment v. South Coast Air Quality Management Dist.* (2010) 48 Cal.4th 310).

The Draft EIR calculates the Proposed Project's operational emissions and makes two comparisons (Comparisons A and B). In Comparison A, the Proposed Project's operational emissions at the expected buildout scenario (year 2028) calculated with 2028 emission factors for on-road mobile sources are compared to the existing baseline conditions (year 2018) calculated with 2018 emission factors for on-road mobile sources. In this comparison, the Proposed Project would result in long-term significant adverse air quality impacts on regional emissions from NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, but not from VOCs. The Draft EIR uses the results from Comparison A to determine the significance level for the Proposed Project's regional air quality impacts during operation. However, when the future conditions are used (Comparison B), the Proposed Project would result in long-term significant adverse air quality impacts on regional VOCs emissions, but not on regional NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions. The Draft EIR includes the results from Comparison B for informational purposes only and does not use them to determine the significance level for the Proposed Project's regional air quality impacts during operation.

The Draft EIR's approach using Comparison A between the Proposed Project's emissions in the future year (using emission rates from year 2028) and the emissions from the baseline (using emission rates from year 2018) improperly credits the Proposed Project with emission reductions that will occur independently of the Proposed Project due to adopted federal and state rules and regulations on clean vehicles and fuel technologies, since these rules, regulations, and technologies are expected to reduce mobile source emissions and improve air quality over time, even in the absence of the Proposed Project. For example, the California Air Resources Board's (CARB)

current regulation for trucks and buses will provide significant near-term and long-term reductions in NO<sub>x</sub> emissions from trucks and buses, at 98 tons per day for 2023<sup>15</sup>.

Using future conditions is reasonable and proper to determine the significance level for the Proposed Project's operational air quality impacts based on the change in activities due to the Proposed Project. Since the Draft EIR has already performed the air quality analysis based on future conditions with the Proposed Project and without the Proposed Project (Comparison B), the Final EIR should use it to determine the significance level for the Proposed Project's regional air quality impacts during operation, or provide an explanation on the rationale for selecting Comparison A for a CEQA significance determination purpose but not selecting Comparison B when Comparison B shows the Proposed Project will have a significant adverse air quality impact on regional VOCs emissions.

## **2. Air Dispersion Modeling Parameter**

To analyze the Proposed Project's localized air quality impacts and HRA, the Draft EIR performs project-specific air dispersion modeling. The Draft EIR states that sensitive receptor locations were determined in a manner that would identify peak ambient air pollutant impacts associated with the Proposed Project<sup>16</sup>. The Draft EIR also states that initial off-site sensitive receptors will have a 100-meter spacing, and that refined sensitive receptors will be placed immediately around the initial impact location using a 25-meter spacing to verify the ultimate peak concentrations have been identified<sup>17</sup>. Based on a review of the air dispersion modeling files, South Coast AQMD staff found that sensitive receptors are placed at the fence line with a 100-meter spacing, that a uniform Cartesian receptor grid with a spacing of 100 meters is used to the northeast of the LAX property boundary over the rental car facility, and that various discrete receptors are placed beyond the LAX property boundary (see Figure 1). The receptor grid that is placed to the northeast of the LAX property boundary might not have been large enough to identify the maximum off-site concentrations. Therefore, South Coast AQMD staff recommends that the Final EIR provide additional information to justify the receptor grid used or perform additional modeling with an expanded receptor grid.

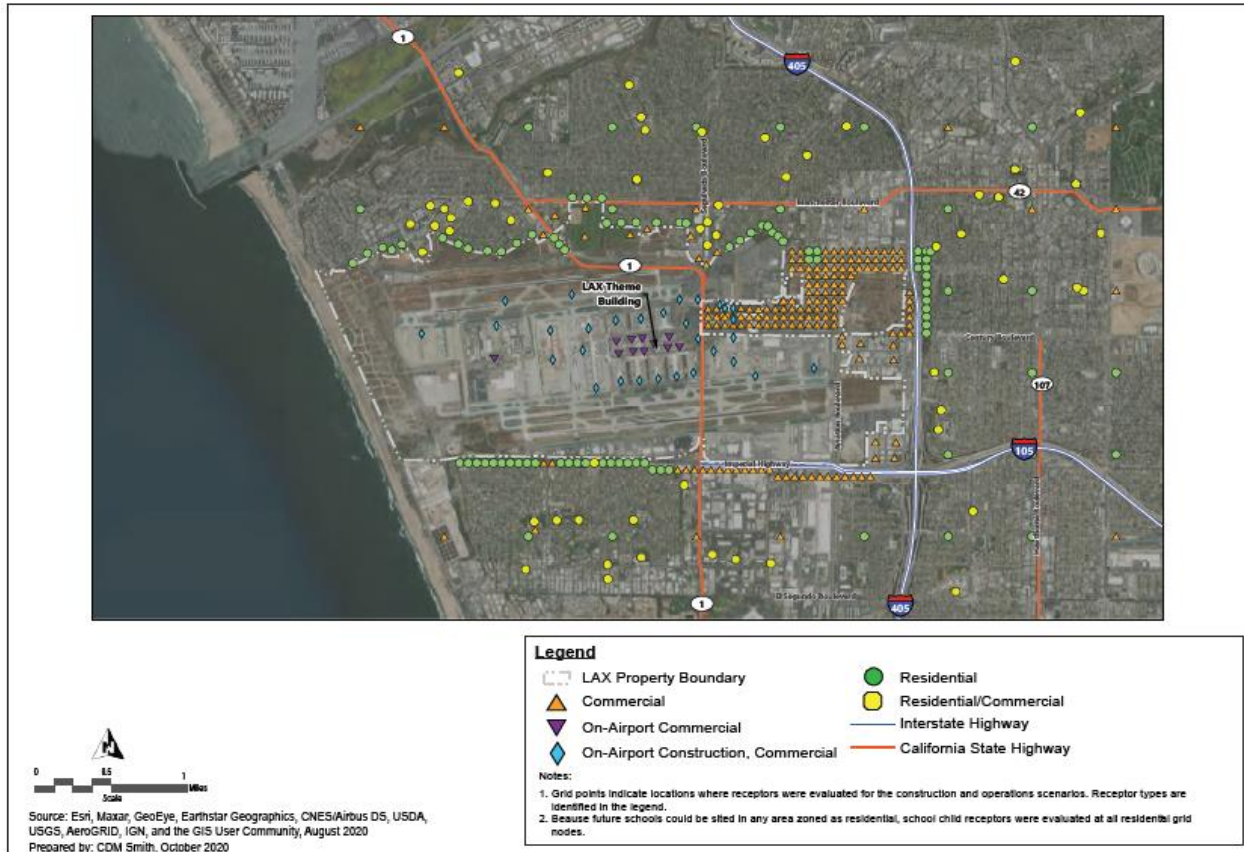
---

<sup>15</sup> California Air Resources Board. July 14, 2017. Trucks and Bus Regulation: On-Road Heavy-Duty Diesel Vehicles (In-Use) Regulation. Accessed at: <https://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>, and <https://www.arb.ca.gov/msprog/onrdiesel/documents/truckrulehealth.pdf>.

<sup>16</sup> Draft EIR. Section 4.1.1. Pages 4.1.1-14.

<sup>17</sup> *Ibid.* Appendix C. Section 4. Page 4-4.

**Figure 1: South Coast AQMD Staff's Copy of Figure 4.1.2-1, Construction and Operations Grid Point Locations from Draft EIR**



**3. Responsible Agency and South Coast AQMD Permits**

The Draft EIR states that South Coast AQMD has authorities to issue permits to construct and permits to operate for stationary sources<sup>18</sup>. The Draft EIR also includes a discussion of South Coast AQMD Rules, including Rule 403 – Fugitive Dust<sup>19</sup> and Rule 1113 – Architectural Coatings<sup>20</sup>.

Based on a review of the Draft EIR, the Proposed Project will use rock crushing equipment during construction, and emergency generators, fire hydrant technologies, and fuel storage tanks during operation. If permits from South Coast AQMD are required, South Coast AQMD should be identified as a Responsible Agency in the Final EIR (CEQA Guidelines Section 15381). If additional stationary equipment will require permits from South Coast AQMD, the Final EIR should identify them in the Project Description and Air Quality Sections, where appropriate (e.g., if a Jet A fuel storage tank has a liquid fuel storage capacity greater than 40,000 gallons, a South Coast AQMD permit may be required pursuant to South Coast AQMD Rule 219<sup>21</sup>). The

<sup>18</sup> Draft EIR. Section 2. Page 2-85.

<sup>19</sup> South Coast AQMD Rule 403 – Fugitive Dust. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/outdated-sip-rules/rule-403-fugitive-dust.pdf>.

<sup>20</sup> South Coast AQMD Rule 1113 – Architectural Coatings. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-xi/r1113.pdf>.

<sup>21</sup> South Coast AQMD Rule 219 – Equipment not Requiring A Written Permit Pursuant to Regulation II. Accessed at: <http://www.aqmd.gov/docs/default-source/rule-book/reg-ii/rule-219.pdf>.

assumptions in the air quality analysis in the Final EIR will be the basis for evaluating the permit under CEQA and imposing permit conditions and limits. Questions on permits can be directed to South Coast AQMD's Engineering and Permitting staff at (909) 396-3385. For more general information on permits, please visit South Coast AQMD's webpage<sup>22</sup>.

### **Conclusion**

Pursuant to California Public Resources Code 21092.5(a) and CEQA Guidelines 15088(b), South Coast AQMD staff requests that LAWA provide South Coast AQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

---

<sup>22</sup> South Coast AQMD. Permits. Accessed: <http://www.aqmd.gov/home/permits>.



**From:** "Sotelo, Anjello" <[ASotelo@elsegundo.org](mailto:ASotelo@elsegundo.org)>  
**Date:** October 30, 2020 at 1:44:06 PM PDT  
**To:** "QUINTANILLA, EVELYN Y." <[EQuintanilla@lawa.org](mailto:EQuintanilla@lawa.org)>  
**Cc:** "Mitnick, Scott" <[smitnick@elsegundo.org](mailto:smitnick@elsegundo.org)>, "Hensley, Mark" <[mhensley@hensleylawgroup.com](mailto:mhensley@hensleylawgroup.com)>, Elias Sassoon <[esassoon@elsegundo.org](mailto:esassoon@elsegundo.org)>, Osa Wolff <[wolff@smwlaw.com](mailto:wolff@smwlaw.com)>, "BRICKER, SAMANTHA" <[SBRICKER@lawa.org](mailto:SBRICKER@lawa.org)>, "Joseph D. Petta" <[petta@smwlaw.com](mailto:petta@smwlaw.com)>, "[bgonzalez@smwlaw.com](mailto:bgonzalez@smwlaw.com)" <[bgonzalez@smwlaw.com](mailto:bgonzalez@smwlaw.com)>, "[limpett@smwlaw.com](mailto:limpett@smwlaw.com)" <[limpett@smwlaw.com](mailto:limpett@smwlaw.com)>  
**Subject:** Request to Extend Deadline for Public Comment re: LAX ATMP DEIR

[City Council b'ccd]

The attached document is being sent on behalf of El Segundo City Manager, Scott Mitnick.

Thank you,



# City of El Segundo

## Office of the City Manager

### Elected Officials

*Drew Boyles,*  
Mayor

*Chris Pimentel,*  
Mayor Pro Tem

*Carol Pirsztuk,*  
Councilmember

*Scot Nicol,*  
Councilmember

*Lance Giroux,*  
Councilmember

*Tracy Weaver,*  
City Clerk

*Matthew Robinson,*  
City Treasurer

---

### Appointed Officials

*Scott Mitnick,*  
City Manager

*Mark D. Hensley,*  
City Attorney

---

### Department Directors

*Barbara Voss,*  
Deputy City Manager

*Joseph Lillio,*  
Finance Director

*Chris Donovan,*  
Fire Chief

*Donna Peter,*  
Human Resources Director  
(Interim)

*Charles Mallory,*  
IT Director

*Melissa McCollum,*  
Library Services Director

*Sam Lee,*  
Planning & Building Safety  
Director

*Bill Whalen,*  
Police Chief

*Elias Sassoon,*  
Public Works Director

October 30, 2020

Evelyn Quintanilla  
Chief of Airport Planning II  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045  
E-Mail: [equintanilla@lawa.org](mailto:equintanilla@lawa.org)

**RE: Request to Extend Deadline for Public Comment on the LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report**

Dear Ms. Quintanilla:

The City of El Segundo ("City") hereby requests an extension of the deadline for public comments on the Los Angeles International Airport Airfield & Terminal Modernization Project Draft Environmental Impact Report ("DEIR"). Public comments on the DEIR are currently due on December 14, 2020. The City requests that the due date be extended to April 30, 2021. This would give the public just over 180 days from the October 29, 2020 release date in which to prepare comments on the DEIR.

This extension is warranted due to the voluminous nature of the DEIR as well as the magnitude and complexity of the environmental impacts associated with the Project, which encompasses two brand-new passenger terminals, multiple taxiway and other airfield improvements, and substantial on- and off-airport circulation improvements. As LAWA's website continues to show as of the date of this letter, the DEIR was originally supposed to be released in the First Quarter of 2020, yet LAWA has taken several additional months to prepare the document. We understand that, to the extent this delay was caused by the coronavirus pandemic, this was largely out of LAWA's control. At the same time, the public is equally impacted by the burdens of the pandemic in terms of its ability to meaningfully comment on this voluminous document in a timely manner. The Thanksgiving holiday will also interfere with the public's ability to review and comment on the DEIR in the short timeframe provided. As a result, the bare statutory minimum of 45 days is insufficient for a Project of this significance. The impacted adjacent residents and communities deserve ample time to review and respond.

Thank you for your consideration of this request. I would appreciate receiving a response at your earliest convenience. Please do not hesitate to call at (310) 524-2301 or email at [smitnick@elsegundo.org](mailto:smitnick@elsegundo.org).

Sincerely,

Scott Mitnick  
City Manager

c: El Segundo Mayor and City Council  
Samantha Bricker, Chief Sustainability and Revenue Management Officer - LAWA  
Osa Wolff, Partner - Shute, Mihaly & Weinberger LLP

---

**From:** Sotelo, Anjello <ASotelo@elsegundo.org>  
**Sent:** Tuesday, January 12, 2021 4:26 PM  
**To:** QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>  
**Cc:** Mitnick, Scott <smitnick@elsegundo.org>; Hensley, Mark <mhensley@hensleylawgroup.com>; Sassoon, Elias <esassoon@elsegundo.org>; Osa Wolff <wolff@smwlaw.com>; BRICKER, SAMANTHA <SBRICKER@lawa.org>; Joseph D. Petta <petta@smwlaw.com>; Coby King <coby@hpstrat.com>  
**Subject:** 2nd Request to Extend Deadline for Public Comment re: LAX ATMP DEIR

[City Council b'ccd]

The attached document is being sent on behalf of El Segundo City Manager, Scott Mitnick.

Thank you,

**Anjello Sotelo | Executive Assistant to the City Manager**

City of El Segundo

350 Main Street El Segundo CA 90245

310.524.2303 | [asotelo@elsegundo.org](mailto:asotelo@elsegundo.org) | [www.elsegundo.org](http://www.elsegundo.org)

CITY OF  
**EL SEGUNDO**



# City of El Segundo

## Office of the City Manager

January 12, 2021

### Elected Officials

*Drew Boyles,*  
Mayor

*Chris Pimentel,*  
Mayor Pro Tem

*Carol Pirsztuk,*  
Councilmember

*Scot Nicol,*  
Councilmember

*Lance Giroux,*  
Councilmember

*Tracy Weaver,*  
City Clerk

*Matthew Robinson,*  
City Treasurer

### Appointed Officials

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City Manager

*Mark D. Hensley,*  
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Community Services Director

*Sam Lee,*  
Development Services Director

*Joseph Lillio,*  
Finance Director

*Chris Donovan,*  
Fire Chief

*Donna Peter,*  
Human Resources Director  
(Interim)

*Charles Mallory,*  
IT Director

*Bill Whalen,*  
Police Chief

*Elias Sassoon,*  
Public Works Director

### Via E-Mail and U.S. Mail

Evelyn Quintanilla  
Chief of Airport Planning II  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045  
E-Mail: [equintanilla@lawa.org](mailto:equintanilla@lawa.org)

### **RE: Second Request to Extend Deadline for Public Comment on the LAX Airfield & Terminal Modernization Project Draft EIR**

Dear Ms. Quintanilla:

The City of El Segundo ("City") hereby requests a second extension of the deadline for public comments on the LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report ("DEIR"). El Segundo requests that the due date be extended by 60 days to April 13, 2021, from the current deadline of February 12, 2021.

On November 24, 2020, the City's outside counsel submitted, on behalf of the City, a request under the California Public Records Act for seven categories of records necessary to conduct a meaningful review of the DEIR. By follow up on December 22, the City's outside counsel informed LAWA that if LAWA did not provide a complete response by January 1, 2021, we would need additional time to prepare our comments.

As of the date of this letter, LAWA has provided only partial responses to fewer than half of our requests. Insufficient time remains before the comment deadline to ensure that the City receives, and can meaningfully review, public records that will inform its DEIR comments. The City therefore asks for a deadline extension to April 13. Thank you for your consideration.

Sincerely,

Scott Mitnick  
City Manager

---

**From:** Sotelo, Anjello <ASotelo@elsegundo.org>  
**Sent:** Thursday, February 18, 2021 11:25 AM  
**To:** QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>  
**Cc:** Mitnick, Scott <smitnick@elsegundo.org>; Hensley, Mark <mhensley@hensleylawgroup.com>; Sassoon, Elias <esassoon@elsegundo.org>; Osa Wolff <wolff@smwlaw.com>; BRICKER, SAMANTHA <SBRICKER@lawa.org>; Joseph D. Petta <petta@smwlaw.com>; Coby King <coby@hpstrat.com>  
**Subject:** 3rd Request to Extend Deadline for Public Comment re: LAX ATMP DEIR

[City Council b'ccd]

The attached documents are being sent out on behalf of El Segundo City Manager, Scott Mitnick.

Thank you,

**Anjello Sotelo | Executive Assistant to the City Manager**

City of El Segundo

350 Main Street El Segundo CA 90245

310.524.2303 | [asotelo@elsegundo.org](mailto:asotelo@elsegundo.org) | [www.elsegundo.org](http://www.elsegundo.org)



**EL SEGUNDO**

Where big ideas take off.



# City of El Segundo

## Office of the City Manager

February 18, 2021

**Via E-Mail and U.S. Mail**

Evelyn Quintanilla  
 Chief of Airport Planning II  
 Los Angeles World Airports  
 1 World Way  
 Los Angeles, CA 90045  
 E-Mail: [quintanilla@lawa.org](mailto:quintanilla@lawa.org)

**RE: Third Request to Extend Deadline for Public Comment on the LAX Airfield & Terminal Modernization Project Draft EIR**

Dear Ms. Quintanilla:

The City of El Segundo (“City”) hereby requests a third extension of the deadline for public comments on the LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report (“DEIR”). El Segundo requests that the due date be extended by 30 days to April 14, 2021, from the current deadline of March 15, 2021.

On November 24, 2020, the City’s outside counsel submitted a request under the California Public Records Act (“PRA”) for records necessary to conduct a meaningful review of the DEIR. By follow up on December 22, counsel informed LAWA that if LAWA did not provide a complete response by January 1, 2021, we would need additional time to prepare our comments. Although LAWA subsequently extended the comment deadline to March 15, LAWA still has not completed its response to this request (see attached February 11, 2021 message from Georgianna Streeter).

Furthermore, on February 1, El Segundo submitted a PRA request for records that are referenced by documents LAWA provided in response to the November 24 request. All of the requested documents are material to El Segundo’s review of and response to the ATMP Draft EIR. LAWA replied that it will need an unspecified amount of time to respond to this request (see attachment).

Based on the foregoing, insufficient time remains before the comment deadline to ensure that the City receives, and can meaningfully review, public records that will inform its DEIR comments. The City therefore asks for a deadline extension to April 14. Thank you for your consideration.

Sincerely,

Scott Mitnick  
 City Manager

Enclosure:

1. February 11, 2021 email response from Georgianna Streeter

c: El Segundo City Council

**Elected Officials**

*Drew Boyles,*  
 Mayor

*Chris Pimentel,*  
 Mayor Pro Tem

*Carol Pirsztuk,*  
 Councilmember

*Scot Nicol,*  
 Councilmember

*Lance Giroux,*  
 Councilmember

*Tracy Weaver,*  
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*Matthew Robinson,*  
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 Development Services Director

*Chris Donovan,*  
 Fire Chief

*Donna Peter,*  
 Human Resources Director  
 (Interim)

*Charles Mallory,*  
 IT Director

*Bill Whalen,*  
 Police Chief

*Elias Sassoon,*  
 Public Works Director

**From:** [Los Angeles World Airports Public Records](#)  
**To:** [Joseph D. Petta](#)  
**Subject:** [External Message Added] Los Angeles World Airports public records request #21-37  
**Date:** Thursday, February 11, 2021 7:03:26 PM

---

-- Attach a non-image file and/or reply ABOVE THIS LINE with a message, and it will be sent to staff on this request. --

## Los Angeles World Airports Public Records

Hi there

A message was sent to you regarding record request #21-37:

Hi Mr. Petta

LAWA is still working to collect and review for privilege the documents requested in your letter, dated February 1, 2021. We are also working to find the 2011 HNTB report from the previous request.

Thank you,

Georgianna Streeter

Environmental Programs

[View Request 21-37](#)

<http://lawa.nextrequest.com/requests/21-37>



**POWERED BY NEXTREQUEST**

*The All in One Records Requests Platform*

Questions about your request? Reply to this email or sign in to contact staff at Los Angeles World Airports.

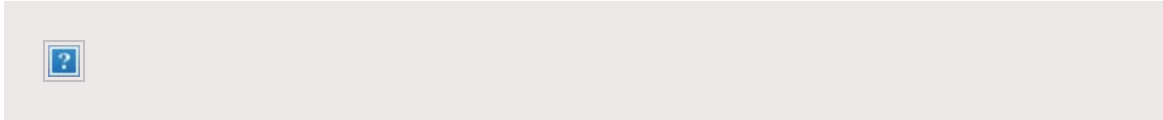
Technical support: See our [help page](#)



**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** FW: Addition to Our LAX Comment Form: Notification  
**Date:** Thursday, March 11, 2021 12:33:32 PM

---

**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Thursday, March 11, 2021 12:14 PM  
**To:** CRUZ, OHASSY C. <OCRUZ@lawa.org>  
**Subject:** Addition to Our LAX Comment Form: Notification



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

Changes since 3/11/21 12:11 PM

1 row added

1 attachment added

---


1 row added or updated (shown in yellow)

Row 73

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 73  |
| <b>Full Name</b>     | Brandy Forbes   |
| <b>Company Name</b>  | City of Redondo Beach, CA   |
| <b>Email Address</b> | <a href="mailto:brandy.forbes@redondo.org">brandy.forbes@redondo.org</a>  |
| <b>Comments</b>      | Please accept the attached official comments from the City of Redondo Beach on the LAX Airfield and Terminal Modernization Project Draft EIR. |
| <b>Created</b>       | 03/11/21 12:11 PM   |
| <b>Project</b>       | ATMP-Draft EIR  |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

---

 1 attachment added



2021 0309 CRB LAX Airfield Modernization Draft EIR Comments001.pdf (829k) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 73: Brandy Forbes

---

You are receiving this email because you are subscribed to a workflow "Notification" (ID# 800236798011268) on sheet [Our LAX Comment Form \(Prod\)](#)

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**Bill Brand**  
Mayor

415 Diamond Street, P.O. BOX 270  
Redondo Beach, California 90277-0270  
www.redondo.org

tel 310 372-1171  
ext. 2260  
fax 310 374-2039

March 9, 2021

Los Angeles World Airports (LAWA)  
PO Box 92216  
Los Angeles, CA 90009-2216  
ATTN: Evelyn Quintanilla, Chief of Airport Planning II

RE: City of Redondo Beach Comments on the LAX Airfield and Terminal Modernization Project Draft Environmental Impact Report

Dear Ms. Quintanilla:

On behalf of the City of Redondo Beach, California, please accept this letter as the City's official written comments on the Draft Environmental Impact Report for the Los Angeles World Airports' LAX Airfield and Terminal Modernization Project. The City respectfully submits these comments to LAWA, as the Lead Agency for the project.

As a community in the vicinity of the ATMP, the City of Redondo Beach has the following concerns:

1. **Expansion Projects/Impacts of Growth.** The DEIR under the "Growth in LAX Passenger Activity Levels" section states that future increases in passenger activity levels at LAX would occur with or without the proposed project. The DEIP claims that improvements, including the development of passenger gates at Concourse 0 and Terminal 9, are not anticipated to result in growth in LAX passenger activity levels beyond what is expected to occur without the proposed project.

Although the DEIR reports that through 2028 the growth projections are the same for constrained versus unconstrained forecasts, in 2029 and thereafter the airport congestion is expected to constrain growth. Yet, the project is integral to hosting the 2028 Olympic and Paralympic Games, "...with LAX serving as the main portal for athletes, dignitaries, and visitors around the world." Without these facility improvements that would increase taxiway operational safety and effectiveness, eliminate passenger busing inefficiencies, and accommodate more gates for more commercial flights, would the current facilities accommodate the 2028 expected utilization for the Olympic and Paralympic Games? If these improvements are necessary for the forecasted growth to happen, including an expected swell in 2028, where otherwise the safety would be compromised with the existing configuration of the taxiway or the passenger experience would be deteriorated from crowded terminals and gates such that travelers would choose to travel through other regional airports, then the clarification should be made that this is more than just enhancing the travelers' experience. With airfield safety limitations and the existing number of gates, induced growth impacts should be analyzed for the project, where the runway system is being significantly enhanced and there will

be a net increase of 9-12 readily-accessible gates. Any necessary mitigation measures to address significant environmental impacts from the induced growth should be included in the Final EIR. This includes the additional noise from increased flight activity resulting from the induced growth, including flight activity over neighboring communities such as Redondo Beach.

2. **Temporary Impacts.** The proposed new terminal (known as Terminal 9) will be the first terminal located east of Sepulveda Boulevard. This represents a major expansion of the central terminal area footprint. Although it is intended to be accessed from Century Boulevard, LAWA is proposing temporary access from Sepulveda Boulevard as well. The concern is that the draft EIR does not adequately evaluate impacts to motorists in the South Bay. Although CEQA may not require it, LAWA should consider the traffic congestion on the critical thoroughfares that would result from this temporary access from Sepulveda Boulevard. Alternatively, LAWA should delay the opening of Terminal 9 until the roadways intended to serve the project are completed. This would eliminate the need for any access from Sepulveda to Terminal 9 and would ensure that the Sepulveda Tunnel and other local streets are not subjected to frequent gridlock conditions, spreading impacts into nearby South Bay communities.
3. **Cargo Operations.** This project does not seem to directly address cargo operations. The DEIR mentions that the replacement of the cargo operations will occur independently from the proposed project. The City of Redondo Beach is concerned that any increased capacity for cargo operations are not compatible with the densely populated South Bay area. To any extent that this project expands cargo operations, the City of Redondo Beach requests that other airports in the region be considered to serve this need instead.

These comments have been reviewed and approved by the Redondo Beach City Council at their March 9, 2021 public meeting. If LAWA has any questions regarding this comment letter, please contact Community Development Director Brandy Forbes at (310) 318-0637 x2200 or via email at [brandy.forbes@redondo.org](mailto:brandy.forbes@redondo.org). Thank you for the consideration of our comments.

Sincerely,



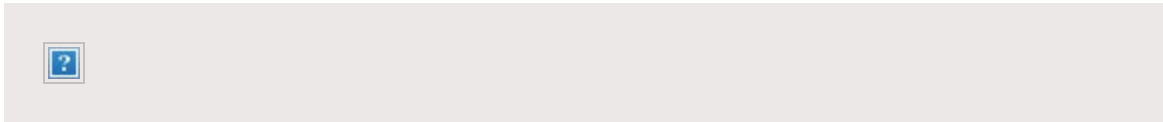
Mayor William Brand

CC: City Council Members, City of Redondo Beach  
Joe Hoefgen, City Manager  
Brandy Forbes, Community Development Director

**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** FW: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 3:22:37 PM

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**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Monday, March 15, 2021 3:22 PM  
**To:** CRUZ, OHASSY C. <OCRUZ@lawa.org>  
**Subject:** Addition to Our LAX Comment Form: Notification



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

Changes since 3/15/21 3:20 PM

1 row added

1 attachment added

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1 row added or updated (shown in yellow)

Row 84

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 84  |
| <b>Full Name</b>     | Robert Nemeth   |
| <b>Company Name</b>  | City of Rancho Palos Verdes   |
| <b>Email Address</b> | <a href="mailto:RNEMETH@RPVCA.GOV">RNEMETH@RPVCA.GOV</a>                              |
| <b>Comments</b>      | See attached comment letter from the City of Rancho Palos Verdes dated March 15, 2021 |
| <b>Created</b>       | 03/15/21 3:20 PM  |
| <b>Project</b>       | ATMP-Draft EIR  |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

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 1 attachment added



20210315 Letter Re Draft EIR for LAX Airfield & Terminal Modernization Project.pdf (2M)

added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 84: Robert Nemeth

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**From:** Nathan Zweizig <NathanZ@rpvca.gov>

**Sent:** Monday, March 15, 2021 4:22 PM

**To:** QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>

**Cc:** Ara Mihranian <AraM@rpvca.gov>

**Subject:** RPV Letter to LAWA Re Draft Environmental Impact Report for the LAX Airfield & Terminal Modernization Project

---

Hello Ms. Quintanilla,

On behalf of Rancho Palos Verdes City Manager Ara Mihranian, please see the attached letter regarding Comments to the Draft Environmental Impact Report for the LAX Airfield & Terminal Modernization Project.

The City Councilmembers and City Manager's below have been BCC'd on this email to avoid any Brown Act violations.

[BCC: Mayor Alegria and Rancho Palos Verdes City Council

William Wynder, City Attorney

June Ailin, City Prosecutor

Jacki Bachrach, Executive Director of the SBCCOG

Rolling Hills City Council and City Manager Elaine Jeng, P.E.

Rolling Hills Estates City Council and City Manager, Greg Grammar

Palos Verdes Estates City Council and City Manager, Laura Guglielmo

Joe Buscaino, Councilman, 15th District, City of Los Angeles

Jacob Haik, Deputy Chief of Staff, Office of Councilman Buscaino

Lomita City Council and City Manager, Ryan Smoot

Redondo Beach City Council and City Manager, Joe Hoefgen

Hermosa Beach City Council and City Manager, Suja Lowenthal

Manhattan Beach City Council and City Manager, Bruce Moe

El Segundo City Council and City Manager, Scott Mitnick]

Regards,

Nathan

**Nathan B. Zweizig**, Administrative Assistant

City Clerk's Office

City of Rancho Palos Verdes

30940 Hawthorne Blvd.

Rancho Palos Verdes, CA 90275

(310) 544-5217

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March 15, 2021

Evelyn Quintanilla  
Chief of Airport Planning II  
Los Angeles World Airports  
Los Angeles International Airport  
1 World Way  
Los Angeles, CA 90045

**SUBJECT: Comments to the Draft Environmental Impact Report for the LAX Airfield & Terminal Modernization Project**

Dear Ms. Quintanilla,

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR). The City of Rancho Palos Verdes, herein the City, is a quiet coastal town on the Palos Verdes Peninsula, approximately 11 miles south of the Los Angeles International Airport (LAX), but near eastbound aircraft pathways departing from LAX. In review of the DEIR for the LAX Airfield & Terminal Modernization Project (ATMP), the City wishes to express the primary concern that the ATMP will result in an increase in aircraft noise pollution caused by eastbound passenger jets overflying the airspace above the Palos Verdes Peninsula.

As you may know, this community and the rest of the Palos Verdes Peninsula has a long history of expressing concerns to Los Angeles World Airports (LAWA) and the Federal Aviation Administration (FAA) regarding noise impacts associated with departing passenger aircraft from LAX. The City is an active participant on the LAX Roundtable and has made exhaustive requests to the FAA to curb passenger jet aircrafts being vectored by FAA air traffic controllers (ATC) over the Peninsula. Despite these repeated requests to simply adhere to the approved flight paths, the Peninsula continues to suffer from noisy passenger jet overflights originating from LAX.

**General Comments**

1. In general, the City is concerned that the ATMP will induce more passenger flights departing from LAX, thus, increasing the likelihood that air traffic controllers will “cut the corner” and improperly and against FAA procedures (OSHNN8), vector additional aircraft at low altitudes over the Palos Verdes Peninsula’s airspace. This has been, and continues to be an issue, additional flight will only exacerbate the issue and increase its likelihood.
2. The City also shares the concerns that have been expressed in separate correspondence by partner cities and the South Bay Cities Council of Governments (SBCCOG). We share the concern that LAWA needs to prioritize efforts to disperse

air traffic to their other regional airports. Without a coordinated plan to disperse infrastructure improvements to other local airports, LAX is guaranteed to see an accelerated growth of air traffic activity. This increase in air traffic activity will inevitably result in noisy air traffic near and over the Peninsula, increased traffic congestion, additional local air pollution concentrations and other negative unintended consequences.

### Specific Comments

1. In reference to Section 2.3.1.2, the City questions the DEIR's projected air traffic passenger growth data, since the LAWA's study was done prior to the outset of the COVID-19 pandemic. LAWA should reconsider the projected growth in light of changes to pandemic-induced passenger travel behavior and reconsider the projected growth at other airports and those airports' ability to handle the projected growth.
2. In reference to Section 4.4, the City encourages LAWA to consider expanding the scope of study for greenhouse gas emissions based on projected aircraft departures from LAX under known aircraft dispersal patterns. Specifically, air pollutants should be studied, which are emitted from passenger jets vectored over the Palos Verdes Peninsula. The toxic air contaminants of concern should be studied over exposed populations based on the quantity and altitudes of passenger jet with Peninsula overflights. LAWA should consider a range of mitigation measures available to lessen passenger jet air pollution over Peninsula residents, including effective communication with TRACON air traffic controllers to vector passenger jets over the ocean east of the HOLTZ waypoint.
3. Specific to Section 4.7.1 of the DEIR and only specific to the construction phase of the project, the City is concerned that the proposed improvements to Runway 6L-24R will cause significant aircraft departure delays and disruptions. Disrupted and inefficient aircraft movement on the ground has the potential of causing FAA departure controllers to rush departures, resulting in congested air traffic between LAX and the Peninsula. We have witnessed that congested air traffic increases the likelihood of vectoring aircraft from the published offshore flight path (OSHNN8) towards the Peninsula because of the FAA's requirement to maintain aircraft separation for safety purposes or because of the pressure placed on air traffic controllers to make up time for departure delays. In addition, given the projected length of the proposed runway construction from 2021 to 2025 and due to the length of runway closures occurring in 4.5-month duration periods, the City is especially concerned that these runway closures may result in disturbing aircraft noise impacts to the community for lengthy periods of time.
4. Section 4.7.1.5.1.1 of the DEIR does not adequately address the foreseen airspace congestion impacts attributed to temporary airfield construction described above nor does the DEIR adequately address or provide mitigation measures for aircraft noise impacts to communities, such as the City of Rancho Palos Verdes, outside of LAWA's Noise Exposure Map. Although the City is not adjacent to LAX, where the Noise Exposure Map illustrates elevated noise disturbances, the City considers

itself a noise-sensitive community due to the low ambient noise levels enjoyed by its visitors and residents.

5. In reference to Section 4.8 of the DEIR, the City, along with the SBCCOG, believes that the DEIR does not adequately evaluate impacts to motorists coming from the South Bay. Although CEQA may not require it, LAWA should not use the Vehicle Miles Traveled standard to avoid responsibility for the increased congestion on the critical thoroughfares that will directly result from this large airport expansion. The City encourages LAWA to work with stakeholders such as the SBCCOG, LA Metro, Caltrans, and surrounding cities who have been working together to identify freeway improvements and can do so again to address off site roadway mitigation improvements necessitated by this project. Even though LAWA may have restrictions by the FAA on paying for these off-facility improvements, the impacts to these facilities occur, nonetheless. For example, it may prove beneficial for LAWA to work with other implementing agencies to address the Century Boulevard exit on the northbound I-405 to allow motorists to head west on Century Boulevard without the need for a traffic signal.
6. In reference to Section 4.8.3.2.1 of the DEIR, the City supports LAWA's proposal to eliminate permanent access from Sepulveda Boulevard to Terminal 9. However, we share the same traffic concerns as that of the SBCCOG about opening the new Terminal 9 before the aerial roadway system is complete. We also believe that temporary access from Sepulveda Boulevard is unwise. There will already be access to Terminal 9 via Century Boulevard and the new Jet Way street, which are not dependent on the construction of the aerial roadway and they should alleviate the need for temporary access from Sepulveda Boulevard, particularly given the burden it will cause on the traffic traveling through the tunnel. We urge you to commit to eliminating any access from Sepulveda Boulevard at any time to Terminal 9. Temporary access is costly and unsafe as you have already recognized by eliminating the permanent access from Sepulveda Boulevard. If a third means of access to Terminal 9 is deemed necessary, then we would ask that you delay the opening of Terminal 9 until the aerial roadway system is completed.

The City supports the concept of continued evolution and a more efficient, modernized LAX. However, it is difficult to support the ATMP without first addressing some of the current vexing issues, such as FAA improper routing of low flying aircraft, local air space congestion, and environmental sustainability. We must have confidence that LAWA is effectively communicating aircraft noise concerns to the FAA and the two agencies are working together to solve this ongoing issue. The City expects LAWA to champion the concerns of those communities affected by aircraft noise pollution and use their resources to influence the FAA, particularly the FAA's air traffic controllers, to adopt more enforceable, reliable, meaningful and measurable aircraft noise mitigation measures than those described in DEIR.

We appreciate your attention to the City's concerns as LAWA finalizes the environmental review. We hope the provided comments, as well as those comments from affected communities, will translate into implementing amicable measures that will mitigate project related impacts to those affected communities, including the City of Rancho Palos Verdes.

City of Rancho Palos Verdes Comments to DEIR  
March 15, 2021

If you have any questions regarding this letter, please contact me at 310-544-5202 or via email at [aram@rpvca.gov](mailto:aram@rpvca.gov).

Sincerely,

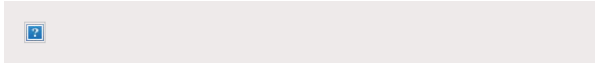


Ara Michael Mihranian, AICP  
City Manager

- c. Mayor Alegria and Rancho Palos Verdes City Council
- William Wynder, City Attorney
- June Ailin, City Prosecutor
- Jacki Bachrach, Executive Director of the SBCCOG
- Rolling Hills City Council and City Manager Elaine Jeng, P.E.
- Rolling Hills Estates City Council and City Manager, Greg Grammar
- Palos Verdes Estates City Council and City Manager, Laura Guglielmo
- Joe Buscaino, Councilman, 15<sup>th</sup> District, City of Los Angeles
- Jacob Haik, Deputy Chief of Staff, Office of Councilman Buscaino
- Lomita City Council and City Manager, Ryan Smoot
- Redondo Beach City Council and City Manager, Joe Hoefgen
- Hermosa Beach City Council and City Manager, Suja Lowenthal
- Manhattan Beach City Council and City Manager, Bruce Moe
- El Segundo City Council and City Manager, Scott Mitnick

**From:** CRUZ, OHASSY C.  
**To:** OWEN, JAMES L.  
**Subject:** Fw: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 4:37:26 PM

**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Monday, March 15, 2021 4:27:30 PM  
**To:** CRUZ, OHASSY C.  
**Subject:** Addition to Our LAX Comment Form: Notification



[Our LAX Comment Form \(Prod\)](#)  
Changes since 3/15/21 4:25 PM

1 rows added  
1 attachments added

1 rows added or updated (shown in yellow)

|  |  | Row ID | Full Name  | Company Name            | Email Address    | Comments              | Created          | Project        |
|--|--|--------|------------|-------------------------|------------------|-----------------------|------------------|----------------|
|  |  | 87     | Carrie Tai | City of Manhattan Beach | ctai@citymb.info | See comment attached. | 03/15/21 4:25 PM | ATMP-Draft EIR |

Changes made by web-form@smartsheet.com

1 attachment added

[City of Manhattan Beach\\_DEIR Comment Letter \\_LAX\\_ATMP.pdf \(3M\)](#) added by web-form@smartsheet.com on Row 87: Carrie Tai.

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**From:** Talyn Mirzakhonian <tmirzakhonian@citymb.info>  
**Sent:** Monday, March 15, 2021 4:29 PM  
**To:** QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>  
**Cc:** Carrie Tai, AICP <ctai@citymb.info>  
**Subject:** ATMP DEIR Public Comment

Good afternoon, Evelyn.

Please accept the attached LAX ATMP Project DEIR comment letter on behalf of the City of Manhattan Beach. We have also submitted the letter via the online comment portal.

Thank you.

|  |   |
|--|---|
| <p>MB Logo</p>  | <p>TALYN MIRZAKHIAN<br/>PLANNING MANAGER</p> <p>310-802-5510<br/><a href="mailto:tmirzakhonian@citymb.info">tmirzakhonian@citymb.info</a></p> |
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**CITY OF MANHATTAN BEACH**

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**CARRIE TAI, AICP**

[www.citymb.info](http://www.citymb.info) • [ctai@citymb.info](mailto:ctai@citymb.info) • (310) 802-5503

March 15, 2021

Ms. Evelyn Quintanilla  
Chief of Airport Planning II  
Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

RE: City of Manhattan Beach Comments on the LAX Airfield & Terminal Modernization Project  
Draft Environmental Impact Report

Dear Ms. Quintanilla:

The City of Manhattan Beach appreciates the opportunity to review Los Angeles World Airport's (LAWA) Draft Environmental Impact Report (DEIR) for the proposed Los Angeles Airport (LAX) Airfield and Terminal Modernization Project (ATMP) and offers the following comments.

1. The ATMP Draft EIR does not properly analyze the actual growth impacts of the modernization program at LAX in inducing increase in aircraft operations that may result in significant environmental impacts. The components of the project that induce and enable the growth of aircraft operations and passenger growth include: airfield improvements, additional aircraft gates, additional concourse and terminal areas, added roadways. While the ATMP DEIR project description states that the four-runway configuration is the only considerable constraint, the reality is that the current airfield configuration, number of aircraft gates, existing concourse and terminal areas, and the existing LAX roadway network are all constraints to airport growth.

We request that LAWA prepare a revised constrained aviation operations forecast based on realistic, actual, on-the-ground constraints, and re-evaluate whether the improvements envisioned in the ATMP are truly necessary.

Furthermore, given that projects like LAMP are still ongoing, we request that LAWA commit to updating an aviation operations forecast annually to reflect the actual growth in passenger activity, expressed in millions of annual passengers (MAP), and operations at LAX. LAWA should commit to providing additional mitigating measures addressing induced Vehicle Miles Traveled, Air Quality, Noise, and Greenhouse Gas Emissions impacts to surrounding communities within 5 miles.

LAX ATMP DEIR Comments  
 City of Manhattan Beach  
 March 15, 2021

2. The use of term "modernization" in the project title is misleading. The project title is the first indicator to the public about what a project entails. The use of a deliberately misleading term masks the true nature of the airport's intended growth, which is contrary to the LAX ATMP DEIR's indication (Section 6.3.2) that passenger activity levels will increase, with or without the project.

The LAX Master Plan "provides for the modernization of the runway and taxiway system, redevelopment of the terminal area, improvement of access to the airport, and enhancement of passenger safety, security, and convenience." ([www.lawa.org](http://www.lawa.org); accessed March 11, 2021) Every LAX project since 2004 LAX Master Plan was adopted has been labeled as a modernization, but significant amounts of building space and amenities, referenced in Comment #4, have been added.

In the Land Access Modernization Program (LAMP), the term "modernization" is used to refer to the Automated People Mover (an entirely new transportation system), the Intermodal Transfer Facilities (ITFs) that result in the additional capacity for potentially over 30,000 vehicles (ITF East - 8,300 parking spaces; ITF West - 8,000 parking spaces), and ConRAC - 8,000 rental car capacity plus 10,000 overflow spaces), enabling and even encouraging the increase in the use of automobiles to travel to and from Los Angeles International Airport. The construction of these facilities will exacerbate the use of vehicles near LAX, contributing to the region's vehicle-related air quality impacts and traffic impacts.

Section 2.3.1 of the ATMP states "Over the past several decades, LAWA has continued to provide modernization-related improvements at LAX that improve the safety and operational management of the airport, improve passenger quality-of-service, and serve to accommodate future growth." As part of the ATMP project, the term "modernization" is being used to describe Concourse O (with 9 new gates, up to 1,275,600 square feet), Terminal 9 (1,413,600 square feet, 12-18 new aircraft gates; 700,000 square-foot parking facility), miles of new roadways, a mile-long taxiway extension for the largest Aircraft Design Group category (ADG VI), among many other project components. The concept of modernization has resulted in tremendous growth at LAX and the DEIR should not assert that the growth would happen without these projects.

3. While LAWA insists that the forecasted growth in air travel will occur regardless of the project, the City finds evidence that LAWA's modernization projects provide a catalyst to accelerate the growth rate of prior forecasts. In comparing the constrained and unconstrained forecasts from the aviation forecasts dated 2012 and 2021, the passenger volume of the unconstrained forecasts actually has become achievable due to airport projects improving factors that previously restrained growth. This, pattern, undertaken over decades, provides a 'chicken and egg' pattern whereby airport projects are undertaken due to "forecasted growth", however those projects themselves accelerate that growth to affect the next growth forecast.



LAX ATMP DEIR Comments  
 City of Manhattan Beach  
 March 15, 2021

Table 1 compares LAX Specific Plan Amendment Study (SPAS) Report Forecast with actual activity at LAX, expressed in Millions of Annual Passengers (MAP):

| Year  | Actual Annual Activity (MAP) | 2012 LAX SPAS Forecast (MAP) |
|-------|------------------------------|------------------------------|
| 2009  | 56.5                         | 56.5                         |
| 2010  | 59                           | 57.4                         |
| 2011  | 62                           | 58.9                         |
| 2012  | 59                           | 60.3                         |
| 2013  | 66.67                        | 61.8                         |
| 2014  | 70.67                        | 63.3                         |
| 2015  | 74.94                        | 64.8                         |
| 2016  | 80.92                        | 66.5                         |
| 2017  | 84.55                        | 68.1                         |
| 2018  | 87.53                        | 69.8                         |
| 2019  | 88.07                        | 71.5                         |
| 2020* | 28.78                        | 73.1                         |

Source: LAWA \*COVID-19 Emergency

During this time, LAWA undertook the following “modernization” projects, among others:

- Modernization of Terminal 2/3 (addition of 830,000 square feet);
- Midfield Satellite Concourse North (700,000 square feet; 11 new passenger gates, supplemental control tower)
- Midfield Satellite Concourse South (150,000 square feet; 8 new gates)
- Terminal 1.5 Construction (417,000 square feet)
- Terminal 6 Renovation (added over 85,000 square feet)
- Tom Bradley International Terminal improvements / Bradley West (Add 1.2 million square feet; 9 new gates)
- Terminal 7 Renovation Project
- Airfield improvements, taxiway projects
- LAX-it – Rideshare lot
- Approval of Land Access Modernization Program, which adds two Intermodal Transfer Facilities, a car rental consolidation facility, and a people mover

The City requests that LAWA provide an analysis to determine what forecasted growth would have been absent these improvements.

LAX ATMP DEIR Comments  
City of Manhattan Beach  
March 15, 2021

4. The LAX Specific Plan Amendment Study Report from July 2012 included an Activity Forecast for Year 2025 showing 78.9 Million Annual Passengers (MAP) (referenced in Appendix F (Page 12)). The Activity Forecast Report in Appendix B of the LAWA ATMP DEIR, upon which the aviation activity for the DEIR is based, forecasts the Year 2025 Annual MAP as 102.9, an increase of 30%. While it is clear that actual annual activity has surpassed the forecast as prepared in 2012, the Aviation Operations Forecast included in Appendix B capitalizes upon the actual activity (likely made possible by significant LAX improvements over the past decade). The ATMP DEIR then uses this as justification that the ATMP is needed to accommodate forecasted growth. We request that LAWA prepare a constrained aviation operations forecast based on realistic, actual, on-the-ground constraints, and re-evaluate whether the improvements envisioned in the ATMP are truly necessary.
5. The project description does not include sufficient detail. Sections 2.4.2.1 and Section 2.4.2.2 of the Project Description states that the specific building sizes have not been identified and that an assumption of an additional 20% has been made to building areas for the purposes of environmental clearance. The purpose of CEQA is not to allow lead agencies to circumvent the public's ability to review the actual nature of the project by putting forth an imprecise project description for purposes of CEQA clearance, only to later change the actual project. Section 15146 of the State CEQA Guidelines indicates that construction projects should have more specific details because its effects can be predicted with greater accuracy. To present a construction project with a conservative added 20% of square footage does not provide sufficient detail of what is being proposed. We request that LAWA provide very specific criteria that would require a subsequent CEQA action per Government Code Section 15162 to evaluate changes should building shapes change in a way that affect other airport components. Specifically, if there are any roadway configuration changes, reduction in travel lane capacity, reduction in parking spaces, changes to the configuration of proposed concourse and terminal areas, and reconfiguration of any airfield spaces that either increase the number of aircraft (by decreasing each aircraft gate size) or decrease in the number of aircraft (by increasing each aircraft gate size), LAWA should document and analyze the changes and provide notification to all parties concerned with the ATMP project.
6. The addition of Concourse 0 and Terminal 9 results in a net increase of 3-12 additional passenger aircraft gates. There is no discussion about the future management of the new gates at Concourse 0 and Terminal 9. The evaluation of new gates should include the total number of passengers that can be accommodated given the new gates. Section 2.4.2.3 indicates that Terminal 9 is anticipated to be used primarily by widebody aircraft. Has an analysis been performed to determine whether this could potentially increase the number passengers?

LAX ATMP DEIR Comments  
City of Manhattan Beach  
March 15, 2021

7. The topic of the West Remote Gates is frequently mentioned throughout the ATMP DEIR, since removal of some of the West Remote Gates offsets the additional gates in Concourse 0 and Terminal 9. The removal of the West Remote Gates has been a frequent topic of past projects, including the Midfield Satellite Concourse project. As a reminder, the Tom Bradley International Terminal (TBIT)/Bradley West Project cited the reduction in the use of the West Remote Gates as a justification. Then, in 2014, the LAX Midfield Satellite Concourse Draft EIR also indicated that the project would reduce reliance on the West Remote Gates and reduce the need to bus passengers to the terminal. This is the same justification used for the construction of Concourse 0 and Terminal 9 (Page 2-10 of the ATMP DEIR). However, Section 2.4.2.3 of the ATMP DEIR states that eighteen gates remain. What reassurances does the public have the remaining West Remote Gates will not continue to be used to serve additional aircraft, be it passenger or cargo, thereby increasing aircraft operations for passengers or cargo?
8. The project description states that a Federal Inspection Services (FIS) facility will be added to Terminal 9 to supplement the existing FIS facility at TBIT, where international passengers arriving into the West Remote Gates are processed. Because some of the West Remote Gates will be decommissioned as part of ATMP, the stated intention of the FIS facility is to process those passengers formerly arriving at the West Remote Gates but now arriving into Terminal 9. This represents an expansion to the FIS processing capabilities at LAX. The City requests that LAWA evaluate the potential for the proposed FIS at Terminal 9 to induce growth beyond the forecasted amount.
9. The DEIR does not explain the significance of identifying portions of the project as “enabling projects”. CEQA requires that all actions that are part of a whole be analyzed as part of the project. Therefore, the DEIR must clarify whether “enabling projects” were analyzed with the same level of detail in the DEIR, specifically with regard to impacts to vehicle miles travelled (construction and hauling trips to remove debris), air quality (dust from demolition activities and hauling activities), public services (impacts on landfill capacity; induced vehicle miles from hauling to landfills that accept the types of debris needing disposal). Please confirm that impacts from the construction of all enabling projects was analyzed at the same level of detail as the main ATMP project components.
10. The Taxiway D “extension” is a substantial addition to the north airfield. The proposed new taxiway in the western portion of the north airfield is conveniently labeled as an extension, but is actually an entirely new mile-long taxiway. The creation of this new taxiway facilitates movement of aircraft off of Runways 6L-24R, enabling closer spacing of landing aircraft. Page 2-16 of the Project Description specifies that LAX is anticipated to be constrained by its four-runway airfield system. While LAWA is not proposing to extend runways, the construction of new taxiways directly increases the capacity of runways, thereby relaxing an identified constraint to

LAX ATMP DEIR Comments  
City of Manhattan Beach  
March 15, 2021

airport forecasts. Page 3-7 of the Operational Analyses Report describes the Taxiway D extension as providing “operational flexibility to allow ATC [Air Traffic Control] to avoid routing aircraft on taxiways that restrict Runway 6R-24L departures” and “the exit taxiways eliminate the need for increased arrival spacing during east flow operation conditions (which currently occurs under existing conditions).” Increased aircraft routing space and decreased landing separations represent relaxation of constraints that have the potential to induce growth.

11. LAX’s geographical placement on the west coast of the United States makes it one of the primary gateways to the Pacific Rim. International flights use primarily ADG V and VI aircraft, due to the aircraft range needed to travel distances between the western United States and Asia or Australia. (Flights to South Pacific areas may use ADG IV, but those flights are not as frequent as those to Asia or Australia simply due to geographical size and population). ADG V and VI aircraft, in addition to having the widest wingspan, have the highest volume passenger capacity. Section 4.4.4 of the Aviation Forecasts Report states that during times of constrained airport operations, airlines will upgauge aircraft. The upgauging of aircraft logistically may mitigate an airline’s challenges at a constrained airport, but also has the potential to increase passenger count due to the airlines efforts to fill all passenger seats on a flight. Airlines may turn to deeply discounted tickets or other measures to fill these seats, potentially increasing the passenger counts beyond the forecasted amounts.

The project description states that Taxiway D “Extension” is designed to accommodate ADG VI aircraft. This will accommodate the largest size passenger aircraft, such as Boeing 777s and Airbus A380s, which have the highest passenger capacity. The facilitation of larger aircraft increases the number of passengers potentially transiting through LAX, inducing growth and straining public services and infrastructure in the surrounding communities and the region. LAWA must evaluate this inducement of growth in a revised forecast instead of assuming that project simply accommodates projected growth.

12. The traffic congestion in the Sepulveda tunnel currently creates a toxic air quality condition for humans inside the tunnel. Keeping in mind that not all passenger vehicles have a functioning climate control system that enables closed windows the entire time, and the length of time motorists spend in the tunnel, such exposure can be harmful to human respiratory systems. The DEIR does not describe how the proposed project does not exacerbate this condition. This is not addressed in the air quality section, nor is it addressed in the Health Risk Assessment.
13. Provide clarification of project schedules. The ATMP project is dependent on improvements that are currently part of the Land Access Modernization Program, which is currently under construction. However, certain ATMP improvements are slated to begin prior to LAMP being completed in 2023. Furthermore, while the project description provides a project schedule on

LAX ATMP DEIR Comments  
City of Manhattan Beach  
March 15, 2021

Figure 2-8, the schedule is in very broad time periods and does not correspond to the identified project elements that comprise the ATMP. Therefore, the City requests that the Draft EIR Project Description be revised to include a more detailed project schedule and that corresponding environmental analysis sections be crosschecked and revised to ensure that impacts are evaluated based on the realistic scenario of on-the-ground conditions.

LAWA has previously stated that project schedules are conceptual and are refined later in project phases. This is generally the case in large and complex capital construction projects like ATMP. However, LAWA's intent to complete the ATMP by 2028, as stated in one of the EIR objectives, means that LAWA has had to develop a more detailed schedule to ensure that this politically-mandated timeline is met. Furthermore, with LAMP undergoing active construction and slated to continue until 2023, the ATMP's stated start time of mid-2021 has to coordinate with the LAMP construction schedule. State CEQA Guidelines Section 15146 indicates that the degree of specificity for a construction project should be more detailed than that of a planning study. Based on the ATMP's many project components, the absence of a detailed project schedule does not allow for proper review or analysis of true impacts. Therefore, the City requests that LAWA include project scheduling for each ATMP project component and correspond these components with the LAMP construction schedule within the ATMP DEIR to meet CEQA intent of full disclosure and providing information in adequate detail for public review.

14. According to the Project Description in the DEIR, construction of Terminal 9 would be completed by late 2027; whereas, construction of the roadway system improvements providing access to Terminal 9 would not be completed until 2028. In the interim, temporary roadway improvements are proposed to provide access to Terminal 9. Consequently, said proposal results in construction-related roadway/traffic impacts to heavily-traveled Sepulveda Boulevard, once during construction of temporary ramps for the interim roadway proposal, and yet again during construction of the permanent roadway improvements as proposed by the project. The project should not bifurcate an operational building (Terminal 9) from the permanent road that serves that building.

Given the bifurcated proposal, the analysis of alternatives in the DEIR is deficient. The DEIR does not evaluate an alternative where no interim roadway access to Terminal 9 is constructed; rather, operation of Terminal 9 commences at a time where the associated, permanent, roadway improvements are completed. Elimination of construction of the interim roadway access to Terminal 9 would minimize the number of days the public is subjected to construction-related roadway/traffic impacts. Elimination of interim roadway construction further minimizes construction and construction traffic-related Air Quality, Greenhouse Gas, and Noise impacts.


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The City requests that this alternative be considered and believes that said alternative is environmentally superior in comparison to the proposed project.

15. Section 4.8 of the DEIR does not include supplemental analysis of Level of Service impacts, the potential severity of those impacts, and consideration of what, if any, mitigation measures could have been derived from that analysis. For a project of this magnitude, particularly one that results in significant and unavoidable Transportation impacts based on a VMT analysis, the project site and surrounding communities could significantly benefit from mitigation that goes above and beyond the mitigation proposed to lessen the severity of VMT impacts. The City requests a supplemental Level of Service analysis and consideration of additional, related mitigation measures or conditions of approval. Said supplemental evaluation should include an analysis of short-term roadway impacts, specifically along Sepulveda Boulevard, during construction of all proposed roadway improvements. The analysis should specify and consider any necessary closures for all Sepulveda Boulevard travel lanes and should identify associated detours.
16. Section 4.8 of the DEIR states that LAWA has committed to annual monitoring of the effectiveness of VMT reduction strategies up to a point where the VMT per employee performance goal of 20.4 (or VMT equivalent) is achieved for three consecutive years. The short-termed nature of this commitment jeopardizes efficiency of the proposed and existing roadways systems; as the VMT performance goals may not be achieved in year four or five, for example, of the consecutive three-year period. The City requests that annual monitoring of VMT reduction strategies continue through 2045 to align with the regional aviation activity forecast and to provide assurance to the neighboring communities that project-related VMT impacts will remain a priority in the long term.

The City of Manhattan Beach appreciates the opportunity to provide comments on this DEIR. Please include the City in all future CEQA and project notifications for this project.

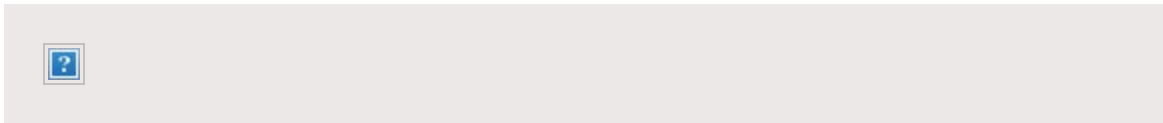
Respectfully,



Carrie Tai, AICP  
Community Development Director

**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** Fw: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 4:45:24 PM

**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Monday, March 15, 2021 4:44:02 PM  
**To:** CRUZ, OHASSY C.  
**Subject:** Addition to Our LAX Comment Form: Notification



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

Changes since 3/15/21 4:41 PM


- 1 row added
- 1 attachment added

1 row added or updated (shown in yellow)

Row 89

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 89  |
| <b>Full Name</b>     | Doug Krauss   |
| <b>Company Name</b>  | Hermosa Beach   |
| <b>Email Address</b> | dkrauss@hermosabeach.gov  |
| <b>Comments</b>      | Thank you for allowing the City of Hermosa Beach the opportunity to comment on the draft EIR. Please contact me with any questions. |
| <b>Created</b>       | 03/15/21 4:41 PM  |
| <b>Project</b>       | ATMP-Draft EIR  |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

 1 attachment added

 [Hermosa Draft Letter to LAWA FINAL Signed 3.15.21.pdf \(295k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 89: Doug Krauss

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**From:** Douglas Krauss <dkrauss@hermosabeach.gov>  
**Sent:** Monday, March 15, 2021 4:44 PM  
**To:** QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>  
**Cc:** Ann Yang <anny@hermosabch.org>; Suja Lowenthal <suja@hermosabeach.gov>; Eduardo Sarmiento <esarmiento@hermosabeach.gov>  
**Subject:** Hermosa Beach comment letter on Draft EIR

Ms. Quintanilla,

Attached is the City of Hermosa Beach's comment letter regarding the draft EIR. We have also submitted this letter through the online comment submittal feature.

Thank you,

**Douglas Krauss**

Environmental Programs Manager | City of Hermosa Beach  
Phone: 310.750-3603 | Email: [dkrauss@hermosabeach.gov](mailto:dkrauss@hermosabeach.gov)  
[COVID-19 updates: hermosabeach.gov/coronavirus](https://www.hermosabeach.gov/coronavirus)



As of Monday March 16, 2020, the City of Hermosa Beach has significantly altered City operations to slow the spread of the novel coronavirus (COVID-19). We have canceled and postponed major events, suspended senior center and community programs and are limiting public access to City offices including City Hall and the Community Center. We are making these changes in compliance with Gov. Gavin Newsom's and public health experts' recommendations to cancel large gatherings and practice social distancing indefinitely.

City staff and services will be transitioning to make services available by phone, email or online and there may be a delay in responding to your email as we work to make the transition. A list of City services and department contact information is available on the [City Directory](#) page of the website. Hermosa Beach police and other City staff that provide essential services outside City Hall – such as street repairs and other public works functions – will continue their work in the community, while taking additional precautions to reduce the risk of spread.

We continue to evaluate impacts and changes to services from the City and our partners and will do our best to keep you updated about changes as information is made available. We appreciate your patience as we work through these changes and encourage you to check back frequently on our website to confirm the status of City services and events at: <https://www.hermosabeach.gov/coronavirus>.





# City of Hermosa Beach

Civic Center, 1315 Valley Drive, Hermosa Beach, CA 90254-3885

March 15, 2021

Evelyn Quintanilla  
Chief of Airport Planning II  
Los Angeles World Airports  
[equintanilla@lawa.org](mailto:equintanilla@lawa.org)

**RE: City of Hermosa Beach's Comments on the LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report**

Dear Ms. Quintanilla:

Thank you for the opportunity to comment and for accepting the City of Hermosa Beach's comments on Los Angeles World Airports' (LAWA) draft Environmental Impact Report (DEIR) for the proposed LAX Airfield & Terminal Modernization Project (ATMP). As explained below, we respectfully request that LAWA address certain issues in a revised DEIR. Specifically, we request that a revised DEIR:

1. Include alternatives that evaluate the ability of "alternative locations" to meet more of the projected regional air travel demand;
2. Disclose the project's tradeoffs between short- and long-term effects;
3. Completely analyze the project's direct impacts including larger regional impacts;
4. Accurately describe and disclose the growth inducing impacts of the project; and
5. Provide innovative, enforceable solutions that mitigate the project's significant air quality and greenhouse gas impacts to the fullest extent possible.

(See State CEQA Guidelines, § 15088.5 [recirculation of DEIR when significant new information is added after public notice of the availability of the DEIR].) The City of Hermosa Beach has also reviewed comments prepared by the City of Manhattan Beach and joins those comments.

Hermosa Beach's concerns arise primarily from LAWA's decision to permit a roughly 50% increase in annual passenger travel through LAX over the next 24 years, limited only by the infrastructure (i.e. "functional components") at LAX. While we value LAWA and LAX as a significant contributor to the mobility and economic health of our region, the ATMP should evaluate a smaller increase in travel through LAX and provide a full evaluation of the ATMP and mitigation of its significant impacts.



### Project Objective/Purpose

Section 1.1.3 of the DEIR provides, in pertinent part, that the objective and purpose of the ATMP is to “support the ongoing modernization of LAX, to provide excellent passenger service, to support the economic growth and prosperity of the Los Angeles region, and to work closely with neighboring communities to reduce airport-related impacts. . . . These improvements [to LAX] would help LAX to prepare early for the continued aviation growth that is projected by LAWA, [SCAG], and the [FAA] to occur at LAX over the next several decades.” (Emphasis added; see also Section 2.3.1 [similar].)

Table 2-1 of the DEIR indicates the “continued aviation growth” at LAX is an increase in “million annual passengers” (MAP) from 84.56 in 2017 to 127 in 2045. That projected growth is attributed to a SCAG document, but Section 6.3.2 and Appendix B of the DEIR indicate it derives from LAWA’s August 2020 ATMP Draft Activity Forecasts Report. (See SCAG, Connect SoCal, Tbl. 3.3.) As indicated in Section 4.1 of Appendix B of the DEIR, LAWA’s forecast of 127 MAP at LAX in 2045 is constrained only by “three categories of functional components” at LAX: “airfield . . . ; terminal . . . ; and landside . . . .”

In short, the “continued aviation growth” at LAX does not derive from a considered plan, but is rather the maximum number of passengers LAX can serve. This echoes the “chicken and egg’ pattern” of LAWA representing projects as needed to meet “continued aviation growth” that actually enable continued unconstrained growth at LAX, as discussed in paragraph 3 of the City of Manhattan Beach’s comments on the DEIR. The DEIR does not consider or explain the extent to which LAWA and SCAG can and should limit the passengers served at LAX as part of a considered, regional plan to meet aviation growth regionally – sometimes referred to as “regionalization.” The DEIR should clearly state how LAWA and SCAG can and have planned to meet aviation growth regionally, as opposed to the process reflected in the DEIR, which simply ties the purpose of the ATMP to meeting the maximum amount of projected growth at LAX, which is presented as a product of SCAG instead of LAWA, and then proposing projects to facilitate that maximum amount of projected growth at LAX.

### Range of Alternatives

Despite Hermosa Beach’s distance from LAX, the airport’s effects on our city’s residents can be seen through the following three significant and unavoidable impacts identified in the draft EIR:

- **Transportation.** The entire South Bay area will experience added traffic congestion when accessing the airport and traveling to and from the west side of Los Angeles and points north.
- **Aircraft Noise.** Noise from aircraft flying over Hermosa Beach affects the quality of life in our community. The ATMP will increase these disturbances.
- **Air Quality and Greenhouse Gases.** Air pollution and an increase in greenhouse gas emissions resulting from the project will affect the communities surrounding LAX and beyond.

In the DEIR, these three impacts are identified as significant and unavoidable, even after the project’s mitigation measures are implemented. (See DEIR, pp. 1-24 to 1-25.) Given these impacts, the DEIR is required to evaluate a reasonable range of alternatives. (Pub. Resources Code, § 21002.1; State CEQA Guidelines, section 15126.6.) While there is no “iron clad” rule governing the nature or scope of the alternatives in an EIR, the range must be reasonable. (State CEQA Guidelines, § 15126.6(a), (f).) For an



alternative to be feasible, the lead agency must take into account site suitability, economic viability, availability of infrastructure, and the regional context for projects with a regionally significant impact. (*Id.*)

Clarity on the process, purpose, and objectives that underlie the ATMP will clarify the reasonableness of the range of alternatives in the DEIR. Section 5.4.1.1 of the DEIR, for example, explains that “no feasible alternative locations exist” because the “underlying purpose of the proposed Project is to support the ongoing modernization of LAX.” As noted, however, the current purpose of the ATMP is to serve the maximum number of passengers LAX can serve. If the purpose of the ATMP is instead to help meet projected growth in regional aviation demand, the DEIR should show that LAX has to maximize the number of passengers it serves to meet that demand. If projected growth is met regionally, “alternative locations” for airfield and terminal modernization are reasonable.

Reasonable alternatives to the ATMP exist that would feasibly accomplish the objectives of meeting continued aviation growth while avoiding or substantially lessening one or more of the significant impacts of the ATMP in the DEIR. Specifically, as noted above, the DEIR should evaluate one or more alternatives that better regionalize air travel. This is particularly timely because, while the DEIR indicates Ontario will significantly increase its role in meeting regional demand, several other regional airports are not increasing their role to meet regional demand. (DEIR, Table 2-1.) This includes airports that have completed and are exploring facility expansion and upgrades. (See SCAG, Aviation and Airport Ground Access, p. 32 [“Palmdale Regional Airport is currently exploring options for scheduled commercial passenger service, and San Bernardino International Airport has recently completed construction on new domestic and international passenger terminals.”].) The DEIR should be revised to include a reasonable range of alternatives, including regional alternatives. (See State CEQA Guidelines, section 15088.5)

Regional alternatives are feasible and should be considered in the DEIR to disclose to LAWA and the public how air traffic can be managed regionally to reduce (or eliminate) the significant impacts of the ATMP. (See State CEQA Guidelines, § 15126.6 [key question when considering alternative locations is whether any significant effects of the project would be avoided or substantially lessened].)

Among other things, regional alternatives would: (1) avoid the project’s significant traffic, noise, air quality and GHG emissions impacts; (2) be feasible based on existing and planned air traffic infrastructure in the region; and (3) meet the objective and purpose of meeting continued aviation growth, supporting the modernization of LAX to provide excellent passenger service, supporting economic growth and prosperity of the LA region, and working closely with LAX’s neighboring communities. (DEIR, p. 1-4.)

### **Mandatory Findings of Significance**

The DEIR should disclose all of the environmental impacts of the proposed project. Specifically, the DEIR should discuss the project’s potential to achieve short-term environmental goals to the disadvantage of long-term environmental goals, as CEQA requires. (State CEQA Guidelines, § 15065(a).) The significant and unavoidable impacts of this project will diminish the region’s quality of life immediately and long-term. As a result, the project would achieve short-term environmental goals to the disadvantage of long-term environmental goals. (See State CEQA Guidelines, § 15065(a)(2) [the project has the potential to achieve short-term environmental goals (e.g., relieving traffic congestion on Sepulveda Boulevard) to the disadvantage of long-term environmental goals (reducing traffic congestion and vehicle miles travelled, generally)].) Thus, LAWA has an obligation to disclose, analyze, and mitigate these impacts. From the



moment construction begins, this project will contribute constant, widespread, and significant impacts to the environmental quality of LAX's neighboring communities by maximizing air travel in and out of LAX. (State CEQA Guidelines, § 15065(c).) LAWA should make every effort possible to vet these impacts and ensure that the aviation growth to be accommodated is the result of a considered plan and the impacts of that growth are mitigated to the maximum extent feasible. (State CEQA Guidelines, § 15126.4.)

### **Specific Environmental Impact Concerns**

We additionally want to reassert the concerns expressed by neighboring communities of the South Bay, which have been submitted to LAWA in separate communications. These shared concerns address overall policy strategies to help encourage LAWA to rethink the scope of this project. Each of these points listed below simultaneously offer possible solutions and mitigation measures that may help to reduce this project's impact on the environmental health and quality of life in the region.

1. **Enhanced Regionalization.** Hermosa Beach strongly supports prioritizing efforts to regionalize air traffic to airports such as Ontario, Palmdale, and San Bernardino. There have been earlier efforts made at regionalization, including as part of a 2006 court settlement over expansion plans at LAX. However, those efforts have not materialized and have not been revisited in the 15 years since as major populations now live in the outlying areas around these regional airports. Regionalization will not only help minimize the impacts of growth on LAX's neighboring communities, it will help expand the economic benefits of increased air traffic to communities who may not have previously benefitted and will provide much greater convenience for large areas of the population of the region.
2. **Traffic Impacts to the South Bay.** The draft EIR should adequately evaluate impacts to transportation from the South Bay to and through the LAX area. We understand LAWA is required to analyze transportation impacts using the vehicle miles traveled (VMT) metric. (Pub. Resources Code, § 21099; *Citizens for Positive Growth and Preservation v. City of Sacramento* (2019) 43 Cal.App.5th 609.) Use of VMT should not obscure the increased congestion that will result from expanding LAX to 127 MAP. That congestion will directly impact the environment (e.g., increased vehicle idling, which, in turn, leads to increased air pollutant emissions). Thus, in addition to VMT, LAWA should evaluate vehicle hours travelled (VHT) and level of service (LOS) to disclose congestion impacts and mitigate them to the extent feasible. (See State CEQA Guidelines, §§ 15065(a)(1) [does the project have the potential to substantially degrade the quality of the environment] & 15065(a)(4) [would the environmental effects of a project cause substantial adverse effects on human beings, either directly or indirectly]; see also *Joshua Tree Downtown Business Alliance v. County of San Bernardino* (2016) 1 Cal.App.5th 677, 689 [project may have impacts beyond the finite questions set forth in an EIR and lead agencies must tailor environmental documents to address those impacts]; see also *Protect the Historic Amador Waterways v Amador Water Agency* (2004) 116 Cal.App.4th 1099 [fact that impact question is not included in Appendix G does not determine whether the issue must be evaluated in an EIR].) In particular, LAWA should work with other stakeholders such as the South Bay Cities Council of Governments (SBCCOG), LA Metro, CalTrans, and surrounding cities who have been working together to identify freeway improvements to address off site roadway mitigation improvements necessitated by this project. For example, it may prove beneficial for LAWA to work with other implementing agencies to



address the Century Boulevard exit on the northbound I-405 to allow motorists to head west on Century Boulevard without the need for a traffic signal.

- Terminal 9.** We appreciate LAWA's commitment to eliminate permanent access from Sepulveda Boulevard to Terminal 9. However, temporary access is possible if Terminal 9 opens before the aerial roadway system is complete. A lead agency must analyze a project's short-term, temporary impacts. (See State CEQA Guidelines, § 15126.2(a) [lead agency should evaluate both "short-term and long-term conditions"]; *Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 455.) If merging movements within the Sepulveda tunnel are already problematic, they may worsen with a temporary access to Terminal 9. There will already be access to Terminal 9 via Century Boulevard and the new Jet Way Street, which are not dependent on the construction of the aerial roadway. We urge LAWA to eliminate access from Sepulveda Boulevard. If a third point of access to Terminal 9 is deemed necessary, we request that Terminal 9 open only when the aerial roadway system is completed and operational.

### **Growth Inducing Impacts**

**Growth Projections.** Although LAWA (and SCAG) project the maximum air traffic growth LAX can serve regardless of the ATMP, it will benefit all stakeholders to re-evaluate growth projections, especially in light of the long-term impacts of COVID-19. Although the current downturn in air traffic will likely rebound in the coming years, it is important to evaluate the long-term behavioral changes accelerated by the pandemic. For example, population centers may shift inland in the next 25 years due to the ability to work remotely and business travel may not return to previous levels.

Additionally, as noted above, we request that LAWA, SCAG, and the region's airport operators plan now – before the ATMP is considered or approved – to meet regional aviation growth through regional airports at Ontario, Palmdale, San Bernardino, and across the region. If infrastructure improvements are needed to enable those airports to accommodate a larger share of regional growth, implementation of those improvements should be an immediate top priority of the region. Otherwise, LAX will grow simply because LAWA, SCAG, and the region's airport operators have not committed the resources to accommodate regional aviation growth regionally, and LAX will continue to grow without a considered, regional plan because only LAX will have the necessary facilities.

An EIR must describe the growth-inducing impacts of the proposed project. (Pub. Resources Code, § 21100(b)(5); State CEQA Guidelines, § 15126(d).) There is reason to believe the ATMP will induce growth. (Manhattan Beach, DEIR Comments, ¶ 3 [“chicken and egg’ pattern” of growth at LAX]; see e.g. State CEQA Guidelines, § 15126.2(e) [certain infrastructure projects remove obstacles to future use or growth; here, expansion of the core project components would improve user-experience, draw additional travelers, and enable and induce further growth, with corresponding impacts].)

### **Greenhouse Gas Emissions**

Reduced air quality and greenhouse gas (GHG) emissions are the most widespread and enduring impact on the region and the planet of the ATMP. As mentioned above and detailed in Section 4.4 of the DEIR, the ATMP will have significantly increase air pollution and GHG emissions from LAX, even after proposed



mitigations. However, many of the strategies described in the EIR are simply reiterations of existing programs and “business as usual” approaches that are insufficient to mitigate the impacts of the ATMP. For example, mitigation measure 4.4.5.1.4 requires mandatory diversion of construction and demolition waste and organic material. But, diversion of construction and demolition waste and organic material is already required and would not reduce GHG emissions to less than significant levels. While existing regulations can mitigate project impacts, if the ATMP will have residual impacts after imposition of existing regulations, LAWA must identify additional mitigation measures that reduce the impact further. In other words, mitigation measures should go “above and beyond” existing regulations. To that end, the City of Hermosa Beach requests that the DEIR impose more innovative and comprehensive mitigation measures to further reduce air pollution and GHG emissions, particularly once the ATMP is operational.

LAX has been contributing significant greenhouse gas emissions for its entire existence and now, as it works to reinforce its permanence and vitality in the region, it should strive to develop pioneering and far-reaching emissions reductions programs and policies that complement its global renown. LAWA need not look far to find transportation hubs that have made innovative efforts to achieve emissions goals that stand as a global model for their respective industry. The ports of Long Beach and Los Angeles partnered on a San Pedro Bay Clean Air Action Plan that aims to improve emissions from all sources associated with the ports. As one of the busiest port facilities in the world, it was recognized that the environmental impacts of the ports are acutely significant on the region and that only innovative and comprehensive strategies would achieve its environmental goals. LAWA should employ a similar strategy that encompasses the operations and impacts of all facilities, tenants, partners and visitors at LAX. For instance, requiring increased usage of alternative aviation fuel would reduce the impacts of the ATMP at and around LAX and at the many destinations to and from which the aircraft travel. LAWA should work with the FAA and airlines to require and memorialize such mitigation measures in the DEIR.

In conclusion, we thank you again for the opportunity to comment on the DEIR. We respectfully request that LAWA evaluate a smaller increase in travel through LAX as part of a full evaluation of the ATMP and mitigation of its significant impacts. As the ATMP and our region prepare to welcome visitors for the upcoming Olympic Games, we urge LAWA to lead an effort to not only just LAX, but to accommodate continued regional aviation growth in a manner that relies on well-planned, innovative, and thoughtful programs that position LAWA and LAX as a global leader for sustainable transportation.

Please contact our Environmental Programs Manager, Douglas Krauss, at [dkrauss@hermosabeach.gov](mailto:dkrauss@hermosabeach.gov) if we can provide additional information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Justin Massey".

**Justin Massey**

Mayor, City of Hermosa Beach

Copy: [citycouncil@hermosabeach.gov](mailto:citycouncil@hermosabeach.gov)

**From:** Chad Molnar <chad.molnar@lacity.org>  
**Sent:** Monday, March 15, 2021 1:38 PM  
**To:** QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>  
**Cc:** ERBACCI, JUSTIN <JERBACCI@lawa.org>; BRICKER, SAMANTHA <SBRICKER@lawa.org>; SCHWARTZ, MICHELLE D. <MSchwartz@lawa.org>; Sean Burton <sburton@cityview.com>; V Velasco <vvelasco@aol.com>; paula.ncwpdr@gmail.com; Dave Mannix <ncwpboard6@gmail.com>; lhughes@gatewaytola.org; Karen Dial <kjdial@gmail.com>; christina@laxcoastal.com; Denny Schneider <Denny@welivefree.com>  
**Subject:** CM Bonin ATMP DEIR Comment Letter

Hello Evelyn,

Please see attached for Councilmember Bonin's comment letter regarding the Draft EIR for the Airfield and Terminal Modernization Project.

Regards,

--

**Chad Molnar**  
*Chief of Staff*  
Councilmember Mike Bonin  
City of Los Angeles  
310-483-6099 | [www.11thdistrict.com](http://www.11thdistrict.com)



| [Sign Up for Mike's Email Updates](#)

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# 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 Los Angeles World Airports (LAWA) reached a landmark settlement agreement with ARSAC (Alliance for a Regional Solution to Airport Congestion), a Westchester-based neighborhood group representing residents in Playa del Rey and Westchester, that allowed for the much-needed modernization at LAX. I brokered that agreement and stood with the community in supporting the tough but fair compromise between ARSAC and LAWA. The agreement stopped the north runways from moving any farther north, and it represented a new way forward for LAX by formalizing the community's cry for "Modernization Yes; Expansion, NO!"

The projects that have since broken ground at LAX represent the fulfillment of that agreement. The Landside Access Modernization Program (LAMP) will reduce car traffic and air pollution by connecting LAX to LA Metro, our regional transportation network. The LAX Northside plan, now soliciting bids from prequalified developers, will provide community amenities like ball fields and athletic facilities, a dog park, neighborhood retail, and green space for Westchester and Playa del Rey. These are good projects for the community, and my constituents support them.

My constituents and I strongly value having a safe, modern, and efficient "world-class airport," while addressing the needs of airport neighbors who want to enjoy their communities without being unduly impacted by airport operations. Though I believe that LAX is building toward being a world-class airport, we can never lose sight of the complementary goal of making it a first-class neighbor. While the current Airfield and Terminal Modernization Project (ATMP) is a big improvement over previous modernization plans that would have decimated Westchester and Playa del Rey, we can still do better by ensuring that any growth in passenger traffic is positively experienced by airport neighbors through smart transportation planning and attention to reducing traffic and congestion in and around LAX. To that end, I write to you to reiterate the concerns that the Neighborhood Council of Westchester/Playa (NCWP), ARSAC, and I raised earlier, and add new opportunities for improving the project, in response to the Draft Environmental Impact Report (DEIR) for the ATMP.

I reiterate some of the concerns from my Notice of Preparation (NOP) letter I sent regarding this project a year ago; LAWA, as lead of the ATMP project, should address the following:

- A complete streets assessment in collaboration with Caltrans of Sepulveda Boulevard is needed to address that corridor's degraded public space and safety concerns for pedestrian connections into the neighborhoods and business improvement districts I represent. Particular focus and remedies to improve pedestrian safety and reduce dangerous driver behavior at the intersection of Lincoln and Sepulveda are needed.

1 of 4

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- Proposed roadway improvements are needed to create additional vehicle queuing capacity into the Central Terminal Area (CTA) to reduce the risk of back up into the intersection of Lincoln and Sepulveda. 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 have still not seen a detailed explanation as to why the double left hand turn pockets proposed at Sepulveda and 96th Streets as part of this project would not be better served by a roadway exit off of the new flyover bridges proposed in the ATMP DEIR that right now only lead to the CTA. Doubling down on providing convenience for drivers into the CTA, without an option to feed LAMP drop-off points outside of the CTA seems short-sighted, and could create new vehicle queuing capacity issues for left-bound drivers at 96th Street that the approximately \$600 million roadway network proposed is trying to address.
- Study additional corridors and intersections outside of what was included in the supporting NOP documentation and the DEIR for the ATMP project. I'm happy to see that 16 additional intersections, including Lincoln & Sepulveda, are being studied as part of a non-CEQA analysis that the Department of Transportation (LADOT) is working on with LAWA.

Also mentioned in my NOP comment letter to this project was the importance of Vehicle Miles Traveled (VMT). The use of this metric versus prior methods using Level of Service (LOS) opens up a new world of opportunities for mitigating this project's impacts on traffic and pollution affecting Westchester and Playa del Rey. VMT allows for targeted solutions to reduce the number of cars traveling to and from LAX, not just building more roadways to handle more cars. As formal mitigations are agreed upon, I am seeking robust mitigations to reduce VMT for both employees and passengers. LAX should directly address the traffic it creates by:

- Reducing fares for FlyAway and public transportation serving the airport. Building on the success of prior transit fare reductions LAWA implemented during peak holiday travel days pre-COVID, additional thresholds of fare reductions need to be automatically implemented if/when VMT targets are not met.
- Improving transit attractiveness and reliability by working with Metro and municipal operators to increase bus and train frequency so that more people will choose public transit versus private cars, thus reducing VMT. LAWA should work with transit operators to ensure that service patterns provide sufficient capacity for airport-related travel.
- Establishing curbside management policies and/or CTA access policies that encourage drivers to pick up and drop off LAX air passengers at points outside of the CTA along the LAMP Automated People Mover to be opened in approximately 2 years.
- Building additional bus-only lanes to feed into the CTA and the LAMP project area to prioritize high-occupancy transit, separating buses from car traffic, reducing congestion and air pollution, and improving the speed and reliability of better transit options serving LAX.

2 of 4

- Expanding the coverage area and scope of the Transportation Management Organization (TMO) that we are working together to establish to include not just airport properties, but nearby office buildings in Westchester, Playa Del Rey, and El Segundo. Such an expansion is crucial to mitigate cumulative VMT growth in the airport vicinity. LAX and nearby supporting businesses and offices represent approximately 50,000 jobs. Employees need more sustainable, cost-effective, and reliable daily transportation options that are competitive and more attractive than driving to work. This would go a long way in ensuring that local neighbors receive much needed relief from LAX-bound traffic.

Data drives accountability, and so we need a robust mitigation monitoring and reporting program (MMRP) for employee and passenger VMT. While passenger air traffic is expected to continue growing at LAX, growth in vehicle traffic is not inevitable. LAWA should embrace and institutionalize an ongoing commitment to tracking and reporting traffic and transportation data. Once airport modernization is complete, there is no future date at which point it won't be necessary to manage landside operations. LAWA's commitment to monitor and manage traffic to the airport should continue through the operational life of the project, not a set date after construction is complete.

Good data drives good decisions. LAWA regularly monitors the numbers of vehicles that enter into the CTA. This monitoring should be expanded to include the Sepulveda & Century Boulevard corridors and pickup and drop-off points in LAMP (ITF West, Metro AMC, ConRAC). Capturing this data and making it publicly available will allow LAWA, the City of Los Angeles, the Department of Transportation (LADOT), Metropolitan Transportation Authority (LA Metro), and others to have the tools they need to invest in the future of mobility to and from the world's 4th busiest airport.

Though traffic and transportation are areas of special focus for me and my constituents, I have one additional suggestion that reflects guidance from the Los Angeles Department of City Planning and the Bureau of Engineering that I would like to see amended in the Final EIR language for this project.

In Chapter 2 of the Draft EIR page 2-85 in the Entitlements Section the text currently reads:

*The proposed Project components are consistent with the City of Los Angeles General Plan, including the LAX Plan and the Westchester-Playa del Rey Community Plan, and LAX Specific Plan zoning regulations. Therefore, no plan amendments or discretionary zoning actions are required to permit development of the proposed airside, landside, or terminal improvements. Additionally, some of the landside improvements would require approval to effect public street vacations and public street easements. LAWA would be required to satisfy specific conditions tied to these public street approvals, including but not limited to, the construction of curbs, gutters, sidewalks, and stormwater drainage.*

To more fully capture investments needed for high-quality public space in the LAX area, I request that the last sentence referenced above instead read:

*LAWA would be required to satisfy specific conditions tied to these public street approvals, including but not limited to, the construction and repair of roadways, curbs, gutters, sidewalks, irrigation, stormwater drainage, landscaping, street trees, street furniture, street lighting, transit shelters, wayfinding signage, and utility relocations.*

3 of 4

The ATMP project comes at a pivotal time for LAWA and the community. Though we can see very visible and hopeful signs that point to a better connected, more sustainable LAX, we still need to do more.. Though ATMP would provide tangible benefits to the community via roadway and air safety improvements, it must also include new investments into the way LAWA monitors and reduces traffic, while ensuring better public space reflective of a more sustainable future.

We must continue living by the spirit of the agreement that was reached with airport neighbors, never forgetting that modernization must happen in partnership with the local community and that LAX is an integral part of that community. I ask for 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 toward that purpose.

Respectfully,



**MIKE BONIN**  
*Councilmember, 11th District*

Cc: Justin Erbacci, CEO - Los Angeles World Airports  
Samantha Bricker, Chief - Sustainability & Revenue Management - Los Angeles World Airports  
Michelle Schwartz, Chief - Corporate Strategy & Affairs - Los Angeles World Airports  
Sean Burton, President - Board of Airport Commissioners  
Val Velasco, Vice President - Board of Airport Commissioners  
Paula Gerez, 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:** Eddie Guerrero <eddie.guerrero@lacity.org>  
**Date:** March 15, 2021 at 5:07:41 PM PDT  
**To:** "QUINTANILLA, EVELYN Y." <EQuintanilla@lawa.org>  
**Cc:** Geoff Thompson <geoff.thompson@lacity.org>, Christine Saponara <christine.saponara@lacity.org>, Jay Kim <jay.kim@lacity.org>, Tomas Carranza <tomas.carranza@lacity.org>  
**Subject:** [Not Virus Scanned] LAX ATMP DEIR

Please find attached, LADOT's comment letter to the draft environmental report (EIR) for the LAX ATMP project.

If you have any questions or have any problems with accessing the document please let me know and it will be addressed immediately.

Thank you for the opportunity to comment on this very important regional project.

--



**Edward Guerrero Jr.**  
Senior Transportation Engineer  
Transportation Planning & Development  
Review

Los Angeles Department of Transportation

213.972.8476

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## CITY OF LOS ANGELES

CALIFORNIA

Seleta J. Reynolds  
GENERAL MANAGER



ERIC GARCETTI  
MAYOR

## DEPARTMENT OF TRANSPORTATION

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March 15, 2021

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

**Subject: LAX AIRFIELD & TERMINAL MODERNIZATION PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT - LADOT COMMENTS**

Dear Ms. Quintanilla:

The City of Los Angeles Department of Transportation (LADOT) appreciates the opportunity to review the Draft Environmental Impact Report, dated October 2020, for the LAX Airfield and Terminal Modernization Project (ATMP). As noted in the project description, in addition to airfield improvements, the Project consists of the following key components that were the focus of LADOT's review:

- **New Terminal Facilities:** includes the construction of Concourse 0 as a new easterly extension of Terminal 1 and the construction of Terminal 9, a new passenger terminal located southeast of the intersection of Sepulveda Boulevard and Century Boulevard.
- **Roadway Improvements:** comprised of approximately 5.8 lane miles of new arrival and departure roadways and a parking facility to support Terminal 9, an additional station on the previously approved LAX Automated People Mover (APM) line with a pedestrian connection to Terminal 9, and a pedestrian corridor between Terminal 8 and 9 that would bridge across Sepulveda Boulevard.

Pursuant to Senate Bill (SB) 743 and the recent changes to Section 15064.3 of the State's California Environmental Quality Act (CEQA) Guidelines, the City of Los Angeles adopted vehicle miles traveled (VMT) as the criteria to determine transportation impacts under CEQA. The transportation analysis in the ATMP DEIR appropriately applies VMT thresholds in assessing the project's transportation impacts. The report notes that potential traffic impacts are based on an assessment of future (2028) conditions both with and without implementation of the project. When estimating daily airport trip generation, the proposed Project is expected to result in new daily vehicle trip activity for approximately 4,700 new employees that would serve the Concourse 0 and Terminal 9 facilities.

The proposed roadway system includes dedicated LAX ramps and roadways that are expected to redirect airport-related queuing away from the adjacent local arterials and onto the new airport ramp

system. LADOT agrees that these roadway improvements and the added storage they offer should help reduce congestion and delays on local arterials including Sepulveda Boulevard and Century Boulevard.

When the Los Angeles City Council adopted the VMT thresholds used for CEQA analyses on July 30, 2019, they also approved the new LADOT Transportation Assessment Guidelines (TAG). In addition to establishing the VMT impact methodology used to process a project's CEQA analysis, the LADOT TAG requires projects to verify consistency with the transportation and mobility objectives of adopted City plans (i.e., Mobility Plan 2035, Vision Zero Initiative, Plan for Healthy LA, etc.). Separate from the CEQA evaluation of the proposed Project, LAWA staff is currently working with LADOT to complete an analysis of the local access and circulation for all users of the transportation system, and is committed to implement improvements identified in this separate analysis.

### **TRANSPORTATION IMPACT ANALYSIS**

As noted in Section 4.8.4 of the DEIR, the proposed Project is a unique land use for which the LADOT VMT estimation tools and thresholds created for traditional land uses (office or residential projects) do not apply; therefore, specific project impact thresholds were developed in accordance with State guidance, and were based on close coordination between LAWA and LADOT. The thresholds developed for the Project analysis focus on three types of VMT created by the proposed Project: (1) VMT per employee; (2) net change in total passenger VMT and; (3) short-term and long-term induced VMT. A significant transportation impact would occur if the proposed Project would:

1. Generate a VMT per employee that exceeds 15 percent below the VMT per employee for the projected Future Baseline 2028 conditions
2. Increase total passenger VMT over the passenger VMT of the projected Future Baseline 2028 conditions
3. Induce substantial additional VMT compared to the VMT of the projected Future Baseline 2028 conditions

As noted in the DEIR Table 4.8.16 (Summary of Impacts and Mitigation Measures), the project would exceed each of these thresholds and would, therefore, result in a significant transportation impact. To address these impacts, the project proposes to implement a VMT Reduction Program, consisting of various transportation demand management strategies with a monitoring and reporting program to verify the VMT reduction benefits of the VMT Reduction Program. However, should full mitigation not be achieved, then the identified impacts would remain significant and unavoidable.

With the upcoming completion of the consolidated Rental Car Facility, the LAX Automated People Mover system, the LAX intermodal transportation facilities, and the Metro LAX/Crenshaw Light Rail Transit line - all expected before 2028, travel behavior and commuter mode shares are expected to be significantly different (compared to current travel patterns) in and around LAX by 2028. Therefore, the baseline scenario used to determine the project transportation impacts compares the 2028 "with project" conditions against the 2028 "without project" conditions, to account for the aforementioned transportation system improvements that are expected to be present when the project becomes operational. The transportation impact analysis and the VMT thresholds established for this project are consistent with State guidance and the changes to CEQA related to Senate Bill 743.

## COMMENTS / RECOMMENDATIONS

LADOT offers the following comments and recommendations on the transportation section of the ATMP DEIR:

### VMT Reduction Program

As noted in the DEIR Table 4.8.16 (Summary of Impacts and Mitigation Measures), the project would exceed each of the impact thresholds identified for the project. To address the project's transportation impacts, the project proposes to implement a VMT Reduction Program consisting of, at a minimum, the following VMT reduction strategies:

- Expand LAWA's Rideshare Program
- Formalize Employee Telecommuting Program
- Provide On-demand Micro Transit Shuttle Program
- Market and Promote Alternative Transportation Options

The analysis anticipates that implementation of these strategies would be sufficient to reduce the airport-wide employment VMT by more than 16,450 daily VMT and fully mitigate the employee VMT impact.

The report also identifies the strategies listed below for evaluation and future consideration in a VMT reduction program:

- Conduct Parking Study to Price Parking to Reduce VMT
- Expand Incentives and Commuter Benefits
- Evaluate Modifications to FlyAway Service
- Explore Incentive Measures from LAWA Mobility Strategic Plan
- Evaluate the Potential for Congestion Pricing in the CTA

In evaluating potential future modifications to the FlyAway program, LADOT recommends that LAWA consider expanding the geographic reach of the service and explore incentives that can increase ridership. It is also recommended that LAWA collaborate with LADOT during the project construction phase to develop a VMT reduction program that, in addition to the strategies listed above, consider, but not be limited to, the following strategies:

- Transit system enhancements - collaborate with Metro, LADOT, and other transit service providers to identify areas of bus service improvements that increase the reliability and reduce travel times of public transit routes that connect to LAX and adjacent areas.
- Evaluate potential curbside management strategies.
- Consider evolving enhancements in transportation technology and their ability to reduce LAX-related vehicle trips and VMT.
- Explore the expansion of the LAX Transportation Management Organization service area.
- Explore the use of big data and digital platforms to better understand trip making behaviors related to LAX and tailor specific strategies accordingly.

Successful transportation demand management programs are outcome-driven, and have a list of strategies to draw from to achieve the stated outcomes. Such programs are also dynamic with the

ability to consider new measures throughout the life of the program or enhancements to existing strategies, after measuring the effectiveness of the program and its strategies.

#### Annual Monitoring and Reporting

In conjunction with the implementation of VMT reduction strategies, LAWA proposes to implement an annual monitoring and reporting process to measure LAX employee VMT each year and to evaluate any noted benefits of the VMT reduction strategies. LADOT agrees that monitoring is a key element to any successful program aimed at reducing vehicle trips and VMT, and recommends that LAWA also include passenger VMT in the annual monitoring program. These reports can inform if additional measures should be implemented by LAWA to achieve desired travel behavior outcomes. As described above, if the program's outcomes are not achieved, then existing strategies should be expanded and/or new strategies should be considered.

To verify VMT reduction achievement, the project proposes to implement an annual monitoring program to report on the effectiveness of the VMT reduction strategies, beginning upon initial operation of Concourse 0 or Terminal 9. The project proposes to eliminate this VMT monitoring requirement once the VMT per employee performance goal of 20.4 or VMT equivalent is achieved for three consecutive years. However, as previously discussed, LADOT recommends that passenger VMT also be monitored, and, to ensure that VMT reduction is retained long term, it is recommended that the monitoring program be conducted over a longer term (at least five years) of successfully achieving the desired outcomes. This would help ensure that VMT reduction strategies perform in a consistent manner that can translate to long term success.

LAWA should work with LADOT to develop a VMT Reduction Monitoring and Reporting Plan to formalize desired outcomes, to summarize the potential list of strategies, to establish a reporting schedule, and to develop monitoring procedures and protocols. As stated above, it is recommended that LAWA collaborate with LADOT to develop this plan post-project approval and during the early phases of the project's construction phase.

#### **CONCLUSION**

The transportation analysis in the project DEIR appropriately applies VMT thresholds in assessing the project's transportation impacts that are consistent with both Senate Bill 743 and City guidance. The assumptions and methodology of the analysis are also consistent with LADOT's Transportation Assessment Guidelines.

LADOT agrees with the project's recommended approach to monitor and report project-related travel patterns and VMT. It is unclear if, and when, regional travel patterns and airport activity will be restored following the COVID-19 pandemic. The infrastructure improvements planned and under construction in and around LAX are also expected to collectively alter travel behavior, reduce vehicle trips within the CTA, and increase the transit mode share of LAX-related traffic. Nonetheless, the transportation analysis in the project DEIR conservatively assumes that airport activity will be at the levels predicted before the pandemic by the project buildout year of 2028, so a monitoring approach is suitable to measure actual activity levels and travel behavior, and address those patterns with VMT reduction strategies accordingly.



Evelyn Quintanilla

- 5 -

March 15, 2021

LADOT appreciates LAWA's continued efforts to pursue projects, like the creation of the Transportation Management Organization, enhancing the FlyAway program, and implementing the strategies identified in the LAX Mobility Strategic Plan. If successfully implemented, these programs can collectively reduce vehicle travel to LAX, increase the mode share of vanpooling and transit use, and reduce greenhouse gas emissions and congestion in the local street system surrounding LAX.

If you have any questions, please contact me at [eddie.guerrero@lacity.org](mailto:eddie.guerrero@lacity.org).

Sincerely,

*Edward Guerrero Jr.*

Edward Guerrero Jr., PE  
Senior Transportation Engineer

c: Geoff Thompson, Council District 11  
Christine Saponara, City Planning

**From:** Joseph D. Petta

**Sent:** Monday, March 15, 2021 1:19 PM

**To:** [EQuintanilla@lawa.org](mailto:EQuintanilla@lawa.org)

**Cc:** Osa L. Wolff <[Wolff@smwlaw.com](mailto:Wolff@smwlaw.com)>; [coby@hpstrat.com](mailto:coby@hpstrat.com)

**Subject:** El Segundo Comments on LAX Airfield & Terminal Modernization Project (email 1 of 2)

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File(s):

El Segundo Ltr re LAX ATMP DEIR 3-15-21.PDF

Compiled Attachments - ATMP comment ltr.PDF

Dear Ms. Quintanilla,

The City of El Segundo's comments on the LAX Airfield & Terminal Modernization Project are attached as two transmittals:

- This email contains the City's comment letter and a separate PDF of "Attachments" referenced in the letter
- A second, follow-up email attaches a separate PDF of "Exhibits" referenced in the letter

All three documents are being transmitted via Mimecast, due to their size.

At your earliest convenience, please confirm that you were able to download and open all three PDFs. I will follow up with you today to ensure you received and were able to download the documents.

Hard copies will also follow by Federal Express.

Please contact me at my email, or mobile phone (510-910-3851) if you have any questions.

Thank you,  
Seph



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**From:** Joseph D. Petta

**Sent:** Monday, March 15, 2021 1:22 PM

**To:** [EQuintanilla@lawa.org](mailto:EQuintanilla@lawa.org)

**Cc:** Osa L. Wolff <[Wolff@smwlaw.com](mailto:Wolff@smwlaw.com)>; [coby@hpstrat.com](mailto:coby@hpstrat.com)

**Subject:** RE: El Segundo Comments on LAX Airfield & Terminal Modernization Project (email 2 of 2)

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File(s):

Compiled Exhibits - ATMP comment ltr.PDF

Dear Ms. Quintanilla,

Here is transmittal #2, per my email below.

Thanks,  
Seph



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March 15, 2021

*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: Comments of City of El Segundo on LAX Airfield & Terminal  
Modernization Project Draft Environmental Impact Report

Dear Ms. Quintanilla:

Please accept the following comments on the Los Angeles World Airports (“LAWA”) Draft Environmental Impact Report (“DEIR”) for the Los Angeles International Airport (“LAX”) Airfield and Terminal Modernization Project (hereafter, “Project” or “ATMP”). These comments are submitted on behalf of our client, the City of El Segundo (“El Segundo”). They consist of this letter, the attached reports (“Attachments”) prepared by expert technical consultants who have provided specialized analysis of certain areas of particular concern, and numerous Exhibits which are bound separately.<sup>1</sup> The Attachments and Exhibits submitted herewith provide additional relevant materials which should be carefully considered by you and the decisionmakers before

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<sup>1</sup> This letter, along with the February 8, 2021 report by Adib Kanifani, Ph.D, N.A.E. (Attachment A hereto, hereafter the “Kanafani Report”); the January 7, 2021 report by Fred M. Svinth, INCE, Assoc. AIA with Illingworth & Rodkin, Inc. (Attachment B hereto, hereafter the “Svinth Report”); the January 14, 2021 report by Neal Liddicoat, P.E., with Griffin Cove Transportation Consulting (Attachment C hereto, hereafter the “Liddicoat Report”); and the January 21, 2021 report by Todd Tamura, QEP, with Tamura Environmental (Attachment D hereto, hereafter the “Tamura Report”), constitute the City of El Segundo’s comments on the DEIR. We respectfully request that the Final EIR respond separately to each of the points raised in the technical consultants’ reports as well as to the points raised in this letter.

Evelyn Quintanilla  
March 15, 2021  
Page 2

taking any action on the proposed Project.

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. 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 DEIR also includes a variety of safety and “efficiency” improvements on the north and south airfields, including lengthened and reconfigured taxiways. 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 Project also includes major roadway demolition and reconstruction, including a consolidation of eastern access to the Central Terminal Area (“CTA”) from Century Boulevard, and direct vehicle access to the proposed Terminal 9 curbside area from Sepulveda Boulevard. 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 would exacerbate a growing problem of travelers and LAX workers using and parking on El Segundo streets. This letter explains the legal inadequacies of the DEIR under the California Environmental Quality Act (“CEQA”), Public Resources Code section 21000 et seq. As we explain below, the DEIR is woefully deficient in numerous respects, and must be substantially revised and recirculated before decisionmakers can consider the Project.<sup>2</sup>

It is important to note that El Segundo is mindful of the fact that it entered into a 2017 settlement agreement with LAWA regarding the LAX Landside Access

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<sup>2</sup> We appreciate that LAWA responded to El Segundo’s request for an extension of the 45-day deadline for public comment on the DEIR, ultimately extending the comment due date to March 15, 2021 from December 14, 2020. LAWA unnecessarily made the process of commenting on the DEIR more difficult, however, by rejecting El Segundo’s request for an “unlocked” copy of the DEIR such that text may be copied and pasted into commenters’ written comments. LAWA’s “policy” not to unlock EIRs that are circulated for public comment makes the public’s right to comment more difficult, particularly when dealing with a document of this DEIR’s size and density.

Evelyn Quintanilla  
March 15, 2021  
Page 3

Modernization Program (“LAMP”). That settlement includes, in relevant part, an agreement by El Segundo not to challenge the LAMP. Both El Segundo and LAWA have lived up to their obligations under the LAMP settlement and the LAMP is currently under construction. Complicating matters, however, is the fact that LAWA has now, as part of the ATMP, proposed various changes to the LAMP. As described in this letter, some of those LAMP changes are concerning to El Segundo. Per the 2017 settlement, El Segundo has not challenged, and would not challenge LAWA’s implementation of LAMP as originally approved and as clearly described in the 2017 settlement agreement. The 2017 settlement does not, however, preclude El Segundo from challenging the changes to LAMP that LAWA is now proposing as part of the ATMP.

**I. The DEIR’s Project Description Is Legally Inadequate.**

**A. The Project Is Not Necessary to Achieve LAWA’s Stated Objectives.**

The DEIR states that the “underlying” Project objectives are to “support the ongoing modernization of LAX, to provide excellent passenger service, to support the economic growth and prosperity of the Los Angeles region;” “to work closely with neighboring communities to reduce airport-related impacts;” “to prepare early for [] continued aviation growth . . . over the next several decades;” and to support “Los Angeles’ plans to host the 2028 Olympic and Paralympic Games.” DEIR at p. 2-18. The DEIR also lists several more “specific” objectives, including to “enhance airfield operational management” and “flexibility for management of aircraft movements on the airfield;” to “[p]rovide for new modern, spacious, and efficient terminal facilities that support the ability to accommodate the projected future growth in passenger levels . . . in a manner that offers . . . operational flexibility;” and to “reduce concentration of traffic and roadway facilities at and around the Century Boulevard/Sepulveda Boulevard/CTA interchange area.” *Id.* at pp. 2-18 and 2-19. Yet, the DEIR does not explain why *this* particular Project, with its enormous scale and impact on the surrounding communities, is the best way or even necessary to achieve these objectives. *See also* Part IV (discussing Project alternatives).

As discussed in detail later in this letter, LAWA’s own statements throughout the DEIR that the Project would have *no effect* on LAX’s passenger or operational capacity undermine the basic presumption of the DEIR that the Project is necessary to achieve LAWA’s stated objectives. The DEIR repeatedly claims that the Project would have no growth effect on the passenger capacity of LAX because specific, quantified future “passenger activity . . . is anticipated to be realized with or without the proposed Project because the ability to accommodate the future aviation demand projected for LAX is not

Evelyn Quintanilla  
 March 15, 2021  
 Page 4

dependent on any of the improvements associated with the proposed Project.” DEIR at p. 6-5; *see generally* DEIR, Appendix B.1. If such statements and analysis are to be believed, then this is not the right Project to “support the ability to accommodate the projected future growth in passenger levels.” DEIR at p. 2-18. As we explain below, LAWA’s assertions that the Project would not contribute to passenger growth are dubious and contradicted by LAWA’s own evidence.

LAWA moreover states that a core aim of the Project is to accommodate travel, including by athletes and dignitaries, to/from Los Angeles for the 2028 Olympic and Paralympic Games (“2028 Olympics”). *Id.* But LAWA does not explain why its existing terminal facilities would not be more than adequate to accommodate these travelers, particularly in light of the DEIR’s statement that “existed and planned terminal facilities [without the Project] would provide adequate processing facilities for all existing and planned passenger gates in FY 2028 and FY 2033.” DEIR, Appendix B.1 at p. 4-6. Particularly since LAWA has already in recent years spent millions, if not billions of dollars upgrading, expanding and “modernizing” the existing CTA terminals, Tom Bradley International Terminal (“TBIT”) and constructing the new Midfield Satellite Concourse (“MSC”) in order “to ensure the ability of aging terminal facilities and passenger processors to accommodate demand for air travel” (*id.*), the DEIR fails to make the case that this Project, too, is necessary to achieve LAWA’s stated objectives.<sup>3</sup>

**B. The DEIR Demonstrates No Effort by LAWA to Understand the COVID-19 Pandemic’s Effect on the Feasibility or Utility of the Project.**

On April 4, 2019 LAWA released the Notice of Preparation (“NOP”) for the ATMP, anticipating a release of the DEIR for public comment in the first quarter of

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<sup>3</sup> On November 24, 2020 (and by a follow-up letter on December 22) El Segundo submitted document requests to LAWA under the California Public Records Act (“PRA”) for, among other things, records of communications between LAWA and airline operators “regarding the need for passenger gates at ‘Concourse 0’ . . . and ‘Terminal 9’ . . . including but not limited to for the purpose of serving demand related to the 2028 Olympics.” *See* Exhibit 1, Nov. 24, 2020 California Public Records Act request from El Segundo to LAWA. El Segundo submitted additional document requests on February 1, 2021. *See* Exhibit 1. El Segundo reserves the right to supplement these comments if LAWA discloses more responsive public records after the comment deadline has passed.

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2020. *See* CEQA Public Scoping Meetings: April 2019 Fact Sheet (Old Version) at p. 3.<sup>4</sup> However, the DEIR was not released for comment until October 29, 2020, more than eight months after the COVID-19 pandemic took hold in California. By this time, not only had demand for air travel experienced a severe, unprecedented decline, but it also was widely understood that that the road to full economic recovery and return to “business as usual” would be long, particularly in light of a months-long winter “surge” in COVID-19 transmission. Despite this knowledge and all of the uncertainty it represents regarding the future of air travel and continued viability of the pre-pandemic aviation industry, LAWA is proposing the identical Project that was described in the NOP.

In a “Preamble” to the DEIR, LAWA simply states that because “the severity and duration of the contraction in aviation activity resulting from the COVID-19 global pandemic are still unknown, . . . the long-term forecasts developed for the proposed Project and documented in this Report are still valid and relevant for the long-term planning purposes of the [ATMP] environmental analyses.” *See also* DEIR at p. 6-4, fn. 5 (“While the pandemic has had a substantial effect on the aviation industry and air travel in general, it is too early (i.e., speculative) to assess the long-term consequences related to aviation forecasts.”). Notably, the DEIR omits the facts that by April 2020, passenger traffic at LAX had fallen by 95%, “reaching levels not seen since the 1950s,” and that although passenger traffic has been “climbing back slowly” by late January 2021 it was still down 74% compared to one year earlier (with international traffic down 83%). *See* Howard Fine, “New LAX Chief Erbacci Navigates Challenges from Covid, Construction”, Los Angeles Business Journal, Dec. 14, 2020;<sup>5</sup> January 2021 LAWA Traffic Comparison (dated February 23, 2021).<sup>6</sup>

Thus, the DEIR does not even attempt to grapple with the obvious question of whether, in light of the potentially long-lasting impacts of the COVID-19 pandemic on passenger air travel, this Project will address or respond to what may be permanent, global changes to the aviation sector, both in terms of demand and how airports and airlines conduct business going forward. Professor Adib Kanafani, Ph.D., N.A.E., whose

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<sup>4</sup> Available at <https://cloud1lawa.app.box.com/s/3nxgt1xq0crmlfnj6180sqprkot5t1bi>; last accessed on Feb. 9, 2021.

<sup>5</sup> Available at <https://labusinessjournal.com/news/2020/dec/14/new-lax-chief-erbacci-navigates-challenges-covid/>; last accessed on Feb. 9, 2021.

<sup>6</sup> Available at <https://www.lawa.org/-/media/7fcedb5f432a46688c4a503b8406feed.pdf>; last accessed Mar. 12, 2021.



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comments on the LAX ATMP DEIR are attached hereto as Attachment A, notes that

[LAWA's] forecasts were made prior to the onset of the current pandemic. While recovery in the aviation system is not unknown and recognized in the preamble to the DEIR, the long-term effects of this pandemic on the behavior of the aviation system and on the socioeconomic factors driving aviation demand are not well understood yet. Some of the changes being witnessed today in work habits, commerce and social activities may become long lasting if not permanent. These changes will likely alter the relation between factors such as GDP growth and air travel demand. Likewise, recent changes in airlines fleets, such as the accelerated retirement of very large aircraft will alter the relation between aircraft operations forecast and passenger traffic forecasts, and relation between airfield and landside operational capacities. These recent changes are not reflected in what is essentially a postpandemic forecast.

Kanafani Report at p. 1; *see also* Jaap Bouwer, Vik Krishnan, and Steve Saxon, “Will airline hubs recover from COVID-19?”, McKinsey & Company, Nov. 5, 2020.<sup>7</sup>

Indeed, on December 10, 2020, more than a month after LAWA released this DEIR which explicitly disregards any “long-term consequences [of COVID-19] related to aviation forecasts,” the Board of Airport Commissioners (“BOAC”) approved a \$50 million contract for a “Principal Engineer/Architect” team to “advance the planning and design” of the ATMP within the context of an aviation sector which has been “dramatically impacted” by the COVID-19 pandemic. *See* Exhibit 2, BOAC Dec. 10, 2020 Agenda Item 14 Staff Report. In recommending contract approval, the BOAC staff report stated that “[t]his unique challenge has required LAWA to re-invent our processes, priorities, and the methodical allocation of our limited resources,” such that the role of the Principal Engineer/Architect would be to “assist LAWA with complex airport planning decisions as we navigate through this transitional period.” *Id.* LAWA’s retention of a consulting team to advise on the ATMP through this “transitional period,” only *after* releasing a lengthy DEIR for a multibillion dollar project fully envisioned before the pandemic, underscores LAWA’s “shoot first, ask questions later” approach to this Project.

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<sup>7</sup> Available at <https://www.mckinsey.com/industries/travel-logistics-and-infrastructure/our-insights/will-airline-hubs-recover-from-covid-19>; last accessed on Feb. 9, 2021.

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The DEIR also omits any consideration of whether it is still reasonable to assume that the Project would be completed and operating on the same schedule as LAWA anticipated at the time the NOP was released. This is an immense and complex Project, construction of which will likely be impacted by the pandemic. All signs point to a significant delay and thus a high unlikelihood of achieving one of LAWA's core objectives of the Project, to be operational in time for the 2028 Olympics.

For the foregoing reasons—in addition to the many other reasons explained in Part II, *infra*—the DEIR lacks substantial evidence for its aviation growth forecast, which undergirds the DEIR's entire environmental impact analysis.<sup>8</sup> In light of the dramatically changed circumstances since the Project's inception, LAWA should reconsider the feasibility and utility of the Project as proposed. Moreover, as addressed in Part I.C, the environmental baseline used to analyze, and develop mitigation for, the Project's significant impacts is not based on substantial evidence and must be revised.

**C. The Environmental Baseline Used for the DEIR's Evaluation of Impacts Must be Replaced, or Supplemented, by a Baseline that Accounts for the Pandemic.**

Except where indicated otherwise (e.g., for the analysis of the Project's vehicle miles traveled ("VMT") impacts), the environmental baseline used to determine the significance of the Project's impacts purports to be based on the environmental setting in April 2019, when LAWA issued the NOP. As noted earlier, however, the environmental setting changed dramatically roughly 8 months before LAWA released the DEIR for comment, with overall operations down nearly 75% compared to the previous year, and international traffic in particular down 83%.

The DEIR cites to section 15125 of title 14 of the California Code of Regulations (hereafter, "CEQA Guidelines") for the statement that "[g]enerally, the lead agency

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<sup>8</sup> El Segundo's November 24, 2020 PRA request asked for "[d]ocumentation supporting the statements in the ATMP DEIR that 'demand for air travel and airline activity is expected to grow consistent with the parameters used in developing the aviation forecasts for the proposed [ATMP] Project,' and that these forecasts 'are still valid and relevant for the long-term planning purposes of the [ATMP DEIR]'" (see "Preamble", ATMP DEIR), despite the fact that these forecasts were completed prior to the COVID-19 pandemic." LAWA's response to this request does not substantiate the quoted statements from the DEIR. LAWA therefore lacks substantial evidence for this claim, in violation of CEQA.

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should describe physical environmental conditions as they exist at the time the notice of preparation is published.” DEIR at p. 4-3. Courts have interpreted this guidance to mean that agencies must “employ a realistic baseline that will give the public and decisionmakers the most accurate picture practically possible of the project’s likely impacts.” *Neighbors for Smart Rail v. Exposition Metro Line Constr. Auth.* (2013) 57 Cal.4th 439, 449. Moreover, the baseline may not be “misleading or without informational value.” *Id.* at 457.

The DEIR instead takes the approach that because a 2019 baseline would be the “default” here under CEQA, there is no need to meaningfully consider whether employing this baseline despite a nearly 75% decline in operations in one year would mislead or “give the public and decisionmakers the most accurate picture practically possible.” The Preamble to the DEIR, which cites anecdotally to previous recoveries from “disruptive events” such as September 11 and the 2008 recession, is the extent of the “evidence” LAWA has marshalled in support of a 2019 baseline. This is not enough, particularly in light of the established rule that lead agencies “may, where appropriate, adjust [their] existing conditions baseline to account for a major change in environmental conditions that is expected to occur before project implementation.” *Neighbors for Smart Rail*, 57 Cal.4th at 452. This is especially true when, as here, a year and a half have passed between the NOP and the publication of the DEIR.

Here, a “major change” in environmental conditions is not “expected” to occur; it *has* occurred, and contrary to LAWA’s claims, any assumption that operations will have returned to “business as usual” once the Project is completed, rather than emerged permanently altered after the present transitional period, is pure speculation. *See* Kanafani Report at p. 1 (stating that current changes “in work habits, commerce and social activities may become long lasting if not permanent.”). If, for example, in a post-recovery aviation industry, more passenger boarding gates enable increased public health vigilance at terminals, then the growth and associated environmental impact of adding up to 29 new passenger gates as part of this Project must be analyzed against a baseline of passenger/operational capacity *without* the public-health benefit of 29 additional gates. LAWA’s approach of assuming, without evidence, a return to 2019 conditions once the Project is completed would conceal this highly plausible effect of the Project on present capacity.

LAWA must update its CEQA baseline to reflect the current/recent reality of operations at LAX. Nowhere is that more apparent than in the context of noise. LAWA is legally obligated, under the 2020 LAX Stipulated Variance approved by Caltrans, to timely produce quarterly reports showing, among other things, the noise impacts of LAX

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on surrounding communities. As of this writing, the last Quarterly Noise Report released by LAWA for LAX covered the first quarter of 2020 (i.e. before the COVID-19 pandemic took hold).<sup>9</sup> LAWA is falling well short of the applicable deadline of “45 days after the end of the calendar quarter” set by the Variance. LAWA’s delay in providing this information is not only inconsistent with the Variance, is also directly relevant to the ATMP DEIR. In the absence of those quarterly reports, the public does not have complete information about how the substantial and sustained decline in LAX operations has impacted noise conditions around LAX. Anecdotal evidence indicates LAX’s noise impacts have declined during the COVID-19 pandemic and are currently lower than the 2019 baseline LAWA relied on in the ATMP DEIR. LAWA must promptly release the delayed quarterly reports to provide the actual noise monitoring data. All the missing data must also be added to the ATMP DEIR and should form the basis for a revised baseline for the analysis of the Project’s noise impacts.

For the foregoing reasons, LAWA must replace, or supplement the 2019 baseline with a baseline that accounts for the effects of the pandemic on the airport’s operations.

**D. THE DEIR Fails to Recognize the Reasonably Foreseeable Relocation of the Mercury Air Cargo Facility.**

LAWA’s description of the Project fails to identify where the Mercury Air Cargo Facility will be relocated, despite the fact it is an enabling project and must be removed prior to construction of Terminal 9. The DEIR notes that relocation of the Mercury Air Cargo Facility “would occur upon expiration of lease and is an independent project; facility demolition is part of the Proposed Project.” DEIR at p. 2-75. This, however, is contradicted by the renegotiated lease between LAWA and Mercury for the facility.

As noted in the DEIR, the Mercury Air Cargo Lease was set to expire on September 30, 2021, but the term of the lease has been extended by two years and includes two one-year extension options. *See* BOAC Agenda for March 4, 2021, Item 4 staff report.<sup>10</sup> Thus, LAWA is failing to disclose either 1) an anticipated delay in the construction timeline for Terminal 9 and the Project generally, or 2) the planned

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<sup>9</sup> Up until recently, LAWA had only released the third quarter 2019 Quarterly Noise Report. On January 4, 2021 LAWA released the fourth quarter 2019 report and on February 8, 2021 LAWA released the first quarter 2020 report.

<sup>10</sup> Available at

[https://lawa.granicus.com/MetaViewer.php?view\\_id=4&event\\_id=1452&meta\\_id=48682](https://lawa.granicus.com/MetaViewer.php?view_id=4&event_id=1452&meta_id=48682); last accessed Mar. 9, 2021.

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relocation site for the facility, given that it is reasonably foreseeable that the Mercury Air Cargo Facility will need to be relocated during the lease period. Under CEQA, LAWA must disclose where the Mercury Air Cargo Facility will be relocated and analyze all significant impacts from the relocation in this EIR; and/or, in order to provide an accurate project description, disclose the anticipated delay in construction of Terminal 9.

**E. The DEIR's Description of the Project's Surface Transportation Components Is Misleading.**

The Project Description omits important details relating to the Project's surface transportation system. In particular, the DEIR states that the project “. . . would build upon improvements approved as part of the LAX Landside Access Modernization Program [LAMP] . . .” DEIR at p. 2-39. The DEIR also refers to “refinements” to the LAMP road system, with the proposed Project's improvements being “integrated with” the LAMP elements. The document does not, however, specifically identify which, if any, LAMP projects would be eliminated or significantly modified as a result of the proposed Project. The EIR should be revised to identify the specific changes to the LAMP road system that will be undertaken in connection with the ATMP. The revised EIR should also include graphics showing this information.

The DEIR also does not disclose the Project's change in parking. The ATMP would involve the acquisition of a number of properties, including existing parking facilities. No indication is provided, however, as to how many parking spaces exist on the properties to be acquired and how many, if any, would continue to be available to serve the parking demand generated by the proposed Project. The revised EIR should identify the number of existing short- and long-term parking spaces and the number of spaces as a result of the Project. It must also specifically identify the number of parking spaces to be provided in the Terminal 9 structure. Further, it must describe how the ATMP's total parking supply compares to the parking demand generated by the ATMP and LAX as a whole.

The DEIR also fails to include key components of the Project pertaining to its construction. Construction of the ATMP is scheduled to begin in late 2021 and run through 2028, while construction of the roadway system improvements would begin in early 2022 and would be completed in early 2028. DEIR at pp. 2-77, 2-78. The DEIR acknowledges that there will be some temporary detours and rerouting of traffic onto nearby streets and onto newly constructed temporary access roads. *Id.* Yet the DEIR fails to include the necessary details of this “temporary” routing of traffic. CEQA requires that an EIR contain sufficient information in the description of the project needed for

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evaluation of the environmental impact and that this information include a general description of the project's principal engineering proposals. CEQA Guidelines § 15124(c). Here, construction of the ATMP would span at least six years and would almost certainly have effects on the local and regional transportation network. Consequently, the revised EIR must include a detailed description of the Project's transportation-related construction activities. At a minimum, this would include specific details pertaining to construction phasing, truck haul/delivery routes, staging locations, contractor parking locations, and work hours. As discussed in Part V.C of this letter, LAWA should cooperate with El Segundo to reduce airport-related traffic congestion on City streets during construction of the ATMP.

**F. The DEIR Falsely Claims That the Project Is Consistent with Achieving Airfield Balance.**

LAWA claims that the Project is consistent with developing a balanced airfield to provide for more efficient and effective use of airport facilities. DEIR at p. 4.6-30. However, LAWA cannot support this statement with substantial evidence. Initially, during the construction of the Project, there will be 9 months during which a runway in the north airfield will be closed between 2022 and 2023, leaving all flights to use the remaining 3 runways. DEIR at p. 4.7.1-39. LAWA notes that when a runway is closed, the FAA will assign runways to maintain a balanced airfield. *Id.*

LAWA provides no analysis regarding the current airfield balance and has been derelict in its duty to provide quarterly noise reports to allow the public, and El Segundo, to understand the current balance in the airfield. As discussed above, as of the date of this letter, LAWA's last quarterly noise report was for Quarter 1 of 2020. Without this information and an analysis of the current state of the airfield balance, LAWA cannot support the statement that the Project would be consistent with developing a balanced airfield.

Furthermore, LAWA must not only analyze the balance in overall operations, but also the balance between the different types of operations, including landing and takeoff, that occur at LAX. For example, a widebody aircraft taking off from LAX would create more noise and a greater disturbance than the same widebody aircraft landing at LAX. El Segundo, having analyzed previous Quarterly Noise Reports, has also found that the south runways have a larger share of widebody aircraft operations throughout the day, and the difference is especially notable for widebody departures from the south runway complex. Exhibit 3, Analysis of 2019 Q1 and Q2 LAX Quarterly Noise Reports.

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This issue is of particular concern to El Segundo because the Project will add more aircraft gates on the southern side of LAX than the northern side. This will likely have the effect of increasing south runway usage and contributing to further runway imbalance. Additionally, proposed Concourse 0 on the north side will likely be used for smaller aircraft (DEIR at p. 2-24) while Terminal 9 will mainly be an international terminal with mostly widebody operations taking off from the south runways (DEIR at p. 2-27).

In sum, LAWA must release the tardy noise reports and use that data to analyze the current state of runway balance at LAX in order to support the statement that the Project would not increase runway imbalance.

**G. LAWA Has Previously Committed to Removal of the West Remote Gates and Cannot Credit Their Removal Against the 27 Additional Gates Created by the Project.**

LAWA has previously committed to removal of the West Remote Gates (“WRGs”) and cannot credit their removal against the 27 additional gates created by the ATMP.<sup>11</sup> In the 2014 programmatic EIR for the MSC, LAWA committed to *replace* the WRGs, such that *all* WRGs would be decommissioned at full buildout of the MSC. MSC Program DEIR at pp. 2-5, 4-16, fn.10.<sup>12</sup> Additionally, in response to comments in the MSC Program Final EIR, LAWA confirmed that it would “decommission the West Remote Gates/Pads once the future phase(s) of the MSC Program is completed, consistent with the approved 2004 LAX Master Plan.” MSC Program FEIR at pp. 2-20, 2-31.<sup>13</sup> The 2004 LAX Master Plan EIS/EIR likewise stated that the MSC would replace the WRGs, such that all WRGs would be decommissioned at full buildout of the MSC.

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<sup>11</sup> On December 23, 2019, we submitted comments on behalf of El Segundo concerning LAWA’s improper determination that the MSC South Project is fully entitled. Exhibit 4, El Segundo Comments on Ricondo MSC South Memo. Despite our request that they be included in the record for the Project, LAWA does not appear to have done so. Our December 23, 2019 comments are incorporated by reference in El Segundo’s comments on the DEIR.

<sup>12</sup> Available at <https://www.lawa.org/lawa-msc-north/project-documents>; last accessed on Feb. 9, 2021.

<sup>13</sup> Available at <https://www.lawa.org/lawa-msc-north/project-documents>; last accessed on Feb. 9, 2021.

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LAX Master Plan FEIS/FEIR at p. 2-85.<sup>14</sup>

Now, LAWA claims that up to 15 of the WRGs are being replaced by the gates created by *this* Project. DEIR at p. 2-38. If this is the case, then the Project and MSC Program are necessarily interdependent projects that must be analyzed together under CEQA. Furthermore, LAWA is improperly double-counting removal of the WRGs to offset impacts from both projects. The revised EIR must address this issue before approval of the Project and before beginning the final phase of the MSC Program.

**1. MSC South Has Been Improperly Segmented from Environmental Review of the Project.**

The MSC Program EIR divided the MSC into an MSC North and MSC South phase, including a project-level analysis for MSC North, and deferred environmental analysis of MSC South to a later date. The MSC Program EIR contains (at least) two references to future environmental review for MSC South: that construction emissions will be discussed under project-level environmental review at such time that LAWA determines the timing of any future phase(s) of the MSC, and that impacts of future projects will be analyzed at a project level once “LAWA determines the timing of such improvements.” MSC Program DEIR at pp. 2-51, 4-11, 4-19.

In 2019, LAWA “approved” 8 additional gates at MSC South based on a cursory environmental review document, the Ricondo MSC South Memo, which was only made available upon request.<sup>15</sup> The Ricondo MSC South Memo included no public participation and claimed that there was no further review required because MSC South, as proposed, was within the “scope” anticipated in the MSC Program EIR. Yet, MSC South’s purpose and design had been modified and fundamentally altered to operate as an enabling project for the ATMP. As such, MSC South did not undergo proper environmental review and must be further analyzed with the ATMP as part of the same project or as an enabling project.

The 2014 MSC Program EIR did not mention or recognize the ATMP as a future foreseeable project in its cumulative impact analysis. *See* MSC Program DEIR at p. 4-56

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<sup>14</sup> Available at <https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/2004-lax-master-plan-program>; last accessed on Feb. 9, 2021.

<sup>15</sup> *See* footnote 11, *supra*. El Segundo provided comments before the BOAC meeting, which are fully incorporated and attached herein as Exhibit 4, El Segundo Comments on Ricondo MSC South Memo.



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(table showing cumulative construction projects' peak daily emissions estimates); *see also id.* at pp. 3-5 through 3-7 (table listing ongoing and future projects at LAX). However, by 2019, LAWA was already well aware that the ATMP would add additional passenger gates because LAWA had released the NOP for the ATMP and MSC South's design was substantially changed in anticipation of the ATMP. According to the BOAC August 1, 2019 Agenda staff report:

The MSC South Project was originally envisioned to be an extension of the MSC North, with similar architecture, function, and scale. To build to this concept would require significant delivery time and investment, as well as necessitate the demolition of the American Airlines (AA) Super Bay Hangar, for which we have no adequate replacement in the near future. However, due to recent growth in passenger activity - as well as ongoing renovation efforts throughout LAX that requires the closure of other gates - there is an urgency to deliver more domestic gates in the near term. Moreover, *with the planned development of Terminal 9 and Concourse 0, there is no longer the same need to use MSC South as a fully functioning international terminal as was originally envisioned.*

Exhibit 5, BOAC August 1, 2019 Agenda Staff Report for Item 15 at p. 3 (emphasis added).

MSC South was initially described as an international terminal in 2014. *Id.* However, the Ricondo MSC South Memo states that MSC South will instead operate as an "open chair" during ATMP construction, and the ATMP DEIR notes that the American Eagle ("AE") Commuter Terminal operations would be transferred to MSC South. *See* Exhibit 6, Ricondo MSC South Memo at pp. 11, 14; DEIR at p. 2-75 (relocation of operations currently at the AE Commuter Terminal to the MSC would occur in conjunction with completion of the south concourse). Thus, MSC South is actually an enabling project for the ATMP. Furthermore, the AE Commuter Terminal currently sits where Terminal 9 is proposed to be built and moving AE's operations is a prerequisite to demolition of the AE Commuter Terminal. The "open chair" concept will allow LAWA the flexibility to maintain operations while ATMP construction is underway.

The DEIR completely fails to acknowledge that MSC South is part of the Project, and therefore fails to disclose the environmental impacts of the "whole of [the] action" to approve these two interrelated projects. *See* CEQA Guidelines § 15378(a). LAWA has improperly piecemealed MSC South from the Project, despite knowing that they are both

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“part of a single, coordinated endeavor.” *Assn. for a Cleaner Environment v. Yosemite Community College Dist.* (2004) 116 Cal.App.4th 629, 639. The revised EIR must include environmental review of MSC South within the ATMP EIR and analyze its impacts along with the Project.

**2. LAWA Must Commit to Enforceable Limits on Use of Any Remaining WRGs and Must Analyze the Levels of Use for These Gates and Related Bus Operations.**

Also disconcerting is the fact that LAWA is now refusing to decommission all WRGs as initially anticipated and instead would leave three WRGs operational. LAWA cannot have it both ways, claiming credit for removal of the WRGs to offset both the increase in gates in the MSC *and* the ATMP, while at the same time renegeing on the commitment to decommission *all* WRGs. LAWA’s shifting promises for removal of the WRGs emphasizes the need for a firm and demonstrable commitment to remove the WRGs as the Project progresses towards completion.

The revised EIR must include an enforceable schedule for the decommissioning of the WRGs (i.e., removal of all passenger loading facilities and associated airfield markings). Moreover, LAWA’s commitment should include a provision that LAWA can no longer rely on the decommissioned WRGs for operations, or credit the remaining three WRGs against future projects.

In light of the history described above, El Segundo remains skeptical of LAWA’s “commitment” to decommission the WRGs as part of the ATMP. For example, the DEIR states that the 15 removed WRGs will no longer be used for regularly-scheduled commercial flights. DEIR at pp. 1-9, 2-20, 2-38, 2-62. However, it is unclear whether this means LAWA is leaving open the possibility that the gates can be used for non-regularly scheduled flights or if LAWA can “reopen” any of the decommissioned gates, especially when only 9 of the 15 WRGs will be actually displaced by the extension of Taxiway D. *Id.* at pp. 1-6, 2-20, 2-38, 2-62. LAWA must specify and lay out the details for decommissioning the WRGs, particularly in light of the DEIR’s failure to include a construction schedule for decommissioning the WRGs.

Without clear and enforceable commitments, El Segundo is concerned LAWA would continue to use the WRGs with impunity. El Segundo is specifically proposing that for each new passenger gate that becomes operational, LAWA will confirm that a corresponding WRG is removed until a maximum of 3 WRGs remain. WRG removal must include demolishing or disabling all passenger boarding facilities and removing

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pavement markings associated with the gate. LAWA would retain full discretion to determine the order in which WRGs are removed and which WRGs ultimately remain (up to the maximum of 3). If LAWA removes WRGs to accommodate the westerly extension of Taxiway D before new passenger gates become operational, LAWA may “bank” those removed WRGs. LAWA would also report which passenger gates have become operational and which WRGs have been decommissioned.

The removal of the WRGs is also suspect due to the continued use and construction of a “sterile bus drop-off platform for passenger busing operations” as part of the ATMP. DEIR at p. 2-27; *see also id.* at p. 2-28 (Terminal 9 would include a sterile international bus curb for passenger busing operations, if needed). Additionally, LAWA is constructing a new LAX Bus Yard Facility, as identified in Table 3-1. *Id.* at p. 3-7. According to the DEIR, the proposed terminal improvements seek to improve passenger experience, increase airlines’ efficiency and reduce busing activity on the airfield through removal and replacement of most WRGs and elimination of the associated busing of passengers. DEIR at pp. 1-4, 2-18, 5-5. Yet, LAWA is still investing in busing, making us skeptical of the actual drawdown of operations in WRGs and remote gates generally.

Any remaining WRGs must include enforceable limits on operations, including guidelines for use during peak conditions and for overflow. LAWA is assuming that there will be low or no use of the WRGs, reducing the apparent capacity at LAX. LAWA must provide evidence that the WRGs will actually be at a reduced capacity and describe what these capacity levels will actually be on a daily basis. Without enforceable limits on operations or any evidence showing reduced capacity at the WRGs, LAWA must analyze and assume full use of the WRGs at levels consistent with past use.

Moreover, bus gates and operations that remain in place throughout the airport must also have enforceable limits. LAWA is planning to build a new bus facility, listed as an enabling project in Table 3-1 of the DEIR. This begs the question: why would LAWA invest in a new bus facility if it is actually planning to eliminate use of the WRGs? LAWA must explain in the DEIR why the bus facility is needed and how it would be used in the near term (prior to WRG decommissioning) and long term (after WRG decommissioning). In the absence of that information, we are concerned that LAWA may be planning to continue its business as usual, or even expand, busing operations to remote gates at LAX. LAWA must analyze the past and future level of use for the bus gates and operations, including the number of buses in operation, where they are or will be parked, and the number and location of bus gates at all terminals. For the new bus facility, LAWA must indicate how big the facility will be, where the buses will be parked and how this fits with the removal of the WRGs and remote terminal.

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## **II. The DEIR Is Fatally Flawed Due to Its Failure to Analyze Project Impacts Beyond the Aspirational Buildout Year of 2028.**

Unlike in previous EIRs for airport expansion projects, in which LAWA has claimed that the project would have no effect on passenger/operational capacity and thus the project would effectively have no operational impacts, here LAWA has taken a new, but still troubling, approach. Once again, LAWA claims that passenger/operational capacity would be essentially unaffected by any of the Project's improvements, and future demand/capacity with the Project would be the same as future demand/capacity without the Project. DEIR at pp. 6-4 and 6-5; *see generally* DEIR, Appendix B.1. In prior EIRs, LAWA used this reasoning to justify concluding that projects' impacts were less than significant or nonexistent. Here, however, for all impacts that LAWA concludes would be significant and unavoidable in the Project completion year (2028) even if the Project were not built—i.e., for impacts which LAWA claims are not the direct or even indirect result of the Project, but would occur anyway—LAWA nonetheless concludes that these impacts are significant and unavoidable *Project* impacts. Effectively, LAWA is hedging its bets that the BOAC, and the City of Los Angeles, will approve this much-touted, long anticipated Project regardless of its impact on the environment and communities surrounding the airport, which for decades have shouldered the burden of LAX's negative externalities.

As explained in the following pages, however, LAWA would be wrong to assume this approach is a prophylactic against a CEQA challenge. First, as a general matter, CEQA requires lead agencies to use “best efforts” to estimate all “reasonably foreseeable” impacts. CEQA Guidelines §§ 15144, 15064(d). Second, LAWA's claim that the Project would have no effect on LAX's passenger/operational capacity is undercut by the forecast data included in the DEIR. Third, it is simply common sense that the Project would expand LAX's operational capacity. Fourth, the DEIR is part of a sustained pattern and practice of thwarting CEQA's requirements by claiming that the Project will have no effect on aviation growth, and therefore no impacts associated with growth. Fifth, the DEIR lacks evidence for its claims that the airport without the Project could accommodate the same operations/year as with the Project in 2028, 2033 and 2045. Each of these is a reason that the DEIR's analysis is fatally flawed and is independent of the others, and thus a separate ground for finding the analysis legally inadequate.

### **A. CEQA Requires Lead Agencies to Use “Best Efforts” to Estimate All “Reasonably Foreseeable” Impacts.**

While the DEIR analyzes impacts for the Project completion year of 2028, except

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in limited instances discussed in the relevant impact discussions below, the document does not analyze impacts beyond 2028. Thus, even though the Project represents an enormous, unprecedented expansion of the airport, including for the first time putting passenger facilities on the east side of Sepulveda Boulevard (18 new passenger gates at the proposed new Terminal 9), the DEIR analyzes the Project's impacts only until the aspirational Project buildout year. In effect, the DEIR just focuses on construction impacts for this huge Project, and ignores the fact that the Project will be a permanent capital improvement to the airport, with added capacity for daily operations continuing indefinitely into the future. The DEIR rationalizes this approach by claiming, through its aviation growth forecast, that operations would be the same with or without the Project, yet the DEIR lacks evidence for this claim and in fact shows that the Project would enable LAX to continue operating at capacity for longer than if the Project were not built. LAWA therefore has not justified truncating its CEQA analysis at the Project buildout year and ignoring the noise, air quality, greenhouse gas ("GHG") and other impacts of the Project's operations.

LAWA cannot claim that analyzing operational impacts out to 2045 would be "speculative" because here no speculation is required: LAWA has provided detailed forecasts of anticipated passenger and aircraft operations out to 2045, 17 years beyond the aspirational buildout year and 26 years beyond the baseline year. DEIR, Appendices B.1 and B.2. The DEIR provides no rationale for concluding that impacts in 2028 would be significant and unavoidable based on forecasted future operations through 2045, while failing to make significance conclusions for impacts beyond 2028. As El Segundo's expert consultants note in their attached reports, LAWA's approach here of truncating its analysis of the Project's operational impacts to a buildout year less than 10 years away is not the norm, especially given the size and scope of the Project. Specifically, it is "surpris[ing] that the future analysis study year is only 10 years from the baseline year (2028), whereas many large projects include study years which are 20 years in the future so as to avoid a future year too close to the current year once the project is implemented." Svinth Report at p. 3 (noting that the EIR for San Jose International Airport's 2017 Master Plan analyzed noise impacts 20 years into the future). *See also* Kanafani Report at p. 2 ("The DEIR fails to assess the effect of the improvements on traffic growth and on the resulting environmental impact of this growth.").

CEQA requires lead agencies to use "best efforts" to estimate all "reasonably foreseeable" impacts. CEQA Guidelines §§ 15144, 15064(d). Because LAWA claims to know the level of passengers/operations at LAX each year through 2045, and has used these growth forecasts to evaluate the Project's impacts in 2028, the DEIR violates this

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basic CEQA requirement. *See* Svinth Report at p. 3 (“Considering that planning projections have been completed to [2045], it seems reasonable to also analyze aircraft noise in the surrounding communities to 2045 or at least to 20 years beyond the [P]roject baseline year.”).

The California Supreme Court has held that an EIR must contain enough information for the public to discern the magnitude of a project’s environmental impacts. In *Cleveland National Forest Foundation v. San Diego Association of Governments*, the Court held that the EIR for SANDAG’s 2010-2050 Regional Transportation Plan/Sustainable Communities Strategy (“RTP/SCS”) adequately described the project’s GHG emissions’ inconsistency with the governor’s executive order on reducing climate change impacts because the public could discern the emissions’ “upward trajectory” and conclude that they would conflict with the order. (2017) 3 Cal.5th 497, 514–15. Nonetheless, the Court advised that the EIR’s GHG analysis should not “serve as a template for future EIRs. Under CEQA, ‘[t]he determination of whether a project may have a significant effect on the environment calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data.’ [CEQA Guidelines § 15064(b).] As more and better data become available,” the rigor with which an agency evaluates a project’s impacts must increase accordingly. 3 Cal.5th at 518.

Here, by contrast, LAWA relies on a forecast of what aircraft operations will be in 2045 in order to support the DEIR’s conclusions regarding aviation growth and associated impacts. Yet, even though it has this data, LAWA provides *zero* information that would help the public discern what the Project’s environmental impacts would be in any year after 2028, whether they would be significant, and if so, how significant and to what extent these impacts would grow over time. “An EIR’s designation of a particular adverse environmental effect as ‘significant’ does not excuse the EIR’s failure to reasonably describe the nature and magnitude of the adverse effect.” 3 Cal.5th at 514-15. “An adequate description of adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternatives at the core of the EIR.” *Id.*

For the foregoing reasons, the DEIR’s analysis of all Project impacts is inappropriately cut off at 2028. LAWA must revise the DEIR to account for these future impacts and recirculate the revised document for public comment.

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**B. LAWA's Claim That the Project Would Have No Effect on LAX's Passenger/Operational Capacity Is Undercut by the Forecast Data Included in the DEIR.**

As noted earlier, the DEIR rationalizes its approach of cutting off its impact analysis at 2028 by claiming, through its aviation growth forecast, that future operations would be the same with or without the Project regardless of year. Yet the DEIR lacks evidence for this claim and in fact shows that the Project would enable LAX to continue operating under capacity for longer than if the Project were not built. Thus, contrary to the DEIR's underlying assumption, the Project *would* enable greater growth and aviation operations at LAX, and all of the associated impacts of these greater operations, than if the Project were not built. Because of this, LAWA's repeated claims throughout the DEIR that the Project would have "no effect" on the passenger capacity of LAX are false, and mislead the public and decisionmakers to believe that the Project would have no impact on the environment. DEIR at pp. 6-4, 6-5.

As explained in detail in the Kanafani Report, the DEIR's growth analysis (Appendices B.1 and B.2) contain a fatal flaw in LAWA's claim that the Project would not contribute to aviation growth. These appendices' underlying conclusions are that: (1) by 2029, airlines will have to set in gear operational changes to prepare for unconstrained growth at LAX which will start causing noticeable congestion around 2031, when there will be approximately 833,000 operations/year (=118.6 MAP); and (2) the ability of the airfield to accommodate any more operations will effectively cease in 2045, at approximately 853,000 operations/year (=127.9 MAP). Thus, 2029 is the "tipping point" between unconstrained/constrained operations, but actual "gridlock" would not occur until 2045.

Appendix B.2, Exhibit 3-2, asserts that in 2028 the Project would, in fact, result in a reduction of annualized delay per operation of approximately 1 minute compared to without the Project. DEIR, Appendix B.2 at p. 3-7 ("Differences in operational conditions are expected under the With Project scenario compared with the No Project scenario as a result of airfield modifications and improvements, and associated operational changes[.]"). This disclosure alone immediately calls into question the DEIR's claim that the Project would have *no* effect on operational capacity since, as Appendices B.1 and B.2 concede, capacity is largely a factor of the airfield's ability to operate up to the point where delays begin to interfere with those operations. Nonetheless the DEIR appears simply to assume that the Project would have "no effect" on operations despite the disclosure that the Project would reduce airfield delays.

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The DEIR moreover assumes, without evidence, that even though the reduction in airfield delay due to the Project would more than double during the 10 years between 2018-2028 (*see* DEIR, Appendix B.2, Exhibit 3-2), the reduction in airfield delay attributable to the Project would not *continue* to grow exponentially *after* 2028. If Exhibit 3-2 were to include additional data points plotting the Project-induced reduction in airfield delay out to 2045, instead of stopping at 2028 as it does now, the chart would likely show the full picture: that over time, the Project’s reducing effect on airfield delay would grow, thus extending into the future the airport’s ability to accommodate demand before delay begins to significantly interfere with operations. Tellingly, LAWA has not provided this data because if it did, LAWA would have to acknowledge that that the Project would have an effect on operational capacity and the impacts associated with those operations.

Put another way, due to the exponential nature of delay, which the DEIR acknowledges in Appendices B.1 and B.2, if one curve were plotted on top of the 2018/2028 Without Project data points and another curve were plotted on top of the 2018/2028 With Project data points, these two curves most likely would continue rising—with the With Project curve rising at a faster rate—as the years progress after Project buildout.<sup>16</sup> Thus, in 2045, the reduction in average airfield delay attributed to the Project would likely be substantially greater than in 2018 and 2028. Assuming this is true—and it is LAWA’s burden to prove otherwise by “substantial evidence”—then the DEIR’s assertions that the Project would not have an effect on passenger/operational capacity are false, and the DEIR’s impact analyses, and mitigation and alternatives analyses must be comprehensively revised to reflect this.<sup>17</sup>

The Kanafani Report further describes this glaring omission. Appendix B.2, Exhibit 3-2 “clearly demonstrates that by reducing delays the capacity of the airfield, which is the limiting capacity of the airport, is increased by the proposed improvements.”

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<sup>16</sup> In response to El Segundo’s February 1, 2021 CPRA request, LAWA provided a document which appears to do just this. Exhibit 7, June 5, 2018 LAX NASIP Technical Analyses at p. 9. As the graph at page 9 of this document illustrates, the average delay reduction attributable to the Project increases exponentially as the years progress.

<sup>17</sup> El Segundo’s November 24, 2020 PRA request asked for “all documents showing that construction of the ATMP, including the proposed improvements to the airfield, would not have the effect of causing this operational delay to occur later than if the Project were not built.” LAWA’s response to this request does not substantiate the DEIR’s assertions. LAWA therefore lacks substantial evidence for this claim, in violation of CEQA.



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Kanafani Report at p. 3. Even if the roughly 1 minute savings in delay per aircraft operation in 2028 were insignificant in terms of impact on traffic growth, which LAWA has not shown to be the case, this Project-induced savings “would increase rapidly past 2028 resulting in a significant impact from the improvements.” *Id.* However, “this increase in capacity has not been taken into account in the estimation of impacts of the improvements on traffic growth and on the development of the constrained traffic forecast.” *Id.* Thus, the Kanafani Report concludes, “[t]he analysis in the forecasting section of the DEIR should be performed with and without the [Project] in order to correctly assess the impact of the improvements on traffic growth” through 2045. *Id.*

The Kanafani Report furthermore finds “wide variations in delay around the annualized total average delay for the various operational conditions and around the average savings from the project.” *Id.* Thus, while the *average* reduction in delay due to the Project in 2028 may be approximately 1 minute, specific savings for some operating configurations, for instance under “West IFR operations” and “East MVFR conditions,” would be far more significant. “Such gains . . . are masked when using only the annualized total average” and “will be even more significant when the analysis is carried beyond 2028.” *Id.* at 4. Thus, the Kanafani Report concludes, “[t]he results of the model should be carefully analyzed to take into consideration potential large delay savings during specific operational conditions and their potential impact on traffic growth.” *Id.*

The DEIR attributes the Project’s delay-reducing effect to various “airfield modifications and improvements” including the proposed extension of Taxiway D, which would increase “operational flexibility,” and the proposed additional Runway 6L exit taxiways, which would “eliminat[e] the need for increased arrival spacing during east flow operating conditions.” DEIR, Appendix B.2 at p. 3-7. Although the DEIR acknowledges these improvements’ role in reducing airfield delay, the DEIR claims without evidence that this reduction in delay does not translate to an increase in passenger capacity or operations. *Id.* at p. 3-8; see Exhibit 8, August 28, 2018 NASIP Briefing at p. 18 (stating that “[f]orecast growth in operations will increase delays” without the Project, but that with the Project “airfield and terminal improvements should allow airfield delays to remain manageable through 2033 to 2035 forecast timeframe.”). The Kanafani Report states, however, that “[t]hese improvements, by streamlining the exit process in both directions on runway 6L/24R, will reduce runway occupancy time and increase the

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throughput, or capacity of the runway.” Kanafani Report at p. 3.<sup>18</sup>

Indeed, controlling law recognizes that airport expansion projects that involve improvements to terminals (such as the proposed addition of Concourse 0 and Terminal 9 here) *and* airfield components (such as the proposed runway 6L/24R exits and Taxiway C and D extensions) must be fully analyzed for their effect on operations growth; the lead agency may not assume without evidence that such projects are not capacity-enhancing, as LAWA has done here. In *Barnes v. U.S. Department of Transportation*, the Ninth Circuit held that growth caused by projects that include runway expansion components must be analyzed “case-by-case.” 655 F.3d 1124, 1139 (9th Cir. 2011). In so concluding the court rejected the FAA’s assertion that growth would happen regardless of the project. *Id.* at 1136-37. The court relied in part on an earlier FAA statement that a new runway is “the most effective capacity-enhancing feature an airfield can provide.” *Id.* at 1138.

Not only does *Barnes*’ statement that growth must be analyzed “case-by-case” undermine LAWA’s unsupported assertion that the Project would not enhance capacity, but, similar to the FAA, here LAWA is also on record previously stating that runway or taxiway upgrades, or changes to arrival/departure procedures, “could, in some circumstances, entail changes in the number of operations that LAX can accommodate.” Terminals 2 and 3 Modernization Project Final EIR at p. 2-31.<sup>19</sup> Despite making this statement on the record, LAWA has failed to do the work in this DEIR to show that the taxiway upgrades and associated changes to arrival/departure procedures proposed as part of the Project would not influence the number of operations that LAX can accommodate.

For the foregoing reasons, the DEIR has no basis to conclude that the Project’s alleviating effect on airfield delay would not significantly affect LAX’s operational capacity, and as a result, cause significant environmental impacts in future years. LAWA must correct these substantial flaws in the DEIR and recirculate the revised document for further public comment.

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<sup>18</sup> Notably the list of airfield improvements to which LAWA attributes the reduction in airfield delay from the Project does not include the proposed extension of Taxiway C; *see* Part III, *infra*.

<sup>19</sup> Available at <https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-2-and-3-modernization>; last accessed Feb. 9, 2021.

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**C. It Is Simply Common Sense that the Project Would Expand LAX's Operational Capacity.**

As discussed above, the DEIR's failure to analyze the Project's effect on operational capacity, and the associated impacts from the increase in capacity, goes directly to CEQA's mandate that the lead agency provide substantial evidence for its conclusions; here, LAWA has failed to provide this evidence. However, as an additional matter, LAWA's claim that the Project would have no effect on operational capacity is simply not credible because it is common sense that a project of this size and scope would expand the airport's operational capacity; indeed, this is the Project's very purpose, as evidenced by LAWA's stated objectives.

The fact that LAWA is proposing to expand LAX to such an extent is itself evidence that this must enable and/or induce additional passenger operations, since otherwise pouring billions of dollars into a major overhaul of the terminals and airfield would be pointless. Merely improving existing passengers' "experience," when LAWA claims that demand will continue to rise at the same rate even if the Project were not built, does not make sense, unless it would also increase revenues and/or enable growth.

Furthermore, evidence exists that major airlines see the Project as necessary to maintain and expand their passenger operations at LAX. In response to El Segundo's request pursuant to the PRA for documents relevant to airlines' purported "need" for the Project, LAWA provided documents stating that "[a]dditional gates [at proposed Concourse 0] will facilitate future growth and ease of operations" (Exhibit 9, June 19, 2019 Southwest Airlines Los Angeles Network Planning at p. 4), and that Concourse 0 is "necessary for [Southwest Airlines] to grow regionally" at an expected 3-5% growth rate in the Los Angeles Basin over the next 10-15 years, and that "much of th[is] growth will be at LAX because of constraints at surrounding airports." Exhibit 10, Southwest Airlines Terminal 1 East CDO & TDIP DED Briefing (January 15, 2020) at slide 4. The document goes on to state that Southwest Airlines growth will be "limited until additional gates" are added at the Southwest terminals and that "gate access limits growth." *Id.* This is due in part to the fact that Southwest is already operating at a very high utilization rate (10.9 turns/gate) and that as Southwest continues to increase flights it "will require more turn time at the gate for boarding/deplaning," and thus more gates. *Id.* In other words, Southwest, the intended occupant of Concourse 0, makes clear that it needs Concourse 0 in order to maintain and expand its passenger operations at LAX. Put another way, Southwest makes clear that airlines already understand the Los Angeles Basin airports as constrained, such that further growth at LAX will not occur unless LAWA proceeds with the projects to enhance LAX's capacity. This is consistent with common sense, but the

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DEIR is instead built on LAWA's nonsensical claim that such growth is inevitable.

This common sense principle about airport expansion is widely recognized. *See, e.g.,* Bill Hethcock, "Dallas Fort Worth International Airport to Add Gates," Dallas Business Journal, Dec. 5, 2018<sup>20</sup> (stating 15 additional gates at repurposed concourse "will support up to 100 additional flights a day"); Jeremy Hill, "U.S. Airports Spend Record Sums to Renovate Amid Travel Boom," Bloomberg News, July 2, 2018<sup>21</sup> (Airports Council president noting that "burst of building" is intended to "meet the demands of passenger growth"); Robert Silk, "More and More Airports Running Out of Space," Travel Weekly, June 17, 2018 ("Running Out of Space")<sup>22</sup> (Boyd Group International president noting "air traffic demand has a tendency to adjust to supply" and that, "as major airports fill up, flights often spill over to nearby, smaller airports").

Furthermore, if as LAWA claims, the real constraint on LAX operations is and will continue to be the airfield, it would not be logical for LAWA to invest so heavily in more passenger gates. As the Kanafani Report notes, because "the capacity of the runway system is the limiting capacity of the airport, the increase in the number of gates with this Project to 177 and the resulting expansion of the terminal system capacity makes little business sense, were it not for the runway capacity increases expected from this Project." Kanafani Report at p. 4. Logically, it would make more sense to match up the number of gates with the anticipated airfield capacity—unless, as discussed in Part II.D, LAWA views its constrained demand forecast as relevant for only as long as it is needed for a particular expansion project, and subject to change (i.e., increase) whenever LAWA conducts a new demand forecast for its next expansion project.

**D. The Project and Its DEIR Are Part of LAWA's Sustained Pattern and Practice of Avoiding Disclosure of Impacts By Claiming that Projects Will Have No Effect on Aviation Growth.**

As explained earlier, with this DEIR, LAWA is yet again claiming, without evidence, that a major airport expansion would have *no effect* on passenger/operational capacity, and future demand/capacity with the Project would be the same as future

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<sup>20</sup> Available at <https://www.bizjournals.com/dallas/news/2018/12/05/dallas-fort-worth-international-airport-to-add.html>; last accessed Feb. 9, 2021.

<sup>21</sup> Available at <https://www.bloomberg.com/news/articles/2018-07-02/travel-surge-has-airports-spending-on-renovation-at-record-pace>; last accessed Feb. 9, 2021.

<sup>22</sup> Available at <https://www.travelweekly.com/Travel-News/Airline-News/More-and-more-airports-running-out-of-space>; last accessed Feb. 9, 2021.

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demand/capacity without the Project; thus the Project would effectively have no operational impacts. DEIR at pp. 6-4 and 6-5; *see generally* DEIR, Appendix B.1. In prior environmental documents LAWA has used this reasoning to justify concluding that projects' impacts were less than significant or nonexistent, whereas here, LAWA asserts that future impacts would be "significant and unavoidable" with or without the Project in 2028. Despite this superficial difference, LAWA is still engaging in the same pattern and practice of avoiding a full environmental analysis as CEQA requires by treating aviation growth as inevitable. Moreover, here it is failing to disclose any operational impacts after 2028 based on the claim that any impacts in future years would occur regardless of the Project.

Notably, LAWA's current practice has not always been its approach to environmental review. Instead this practice has manifested in recent years as LAWA has attempted to shift away from the comprehensive development vision set out in its last long-range planning document for LAX—the 2004 Master Plan—and transitioned back to a "piecemeal," project-by-project approach to airport expansion.

In the late 1990s and early 2000s, LAWA undertook a Master Plan process to establish a long-term vision for LAX. When the Master Plan EIS/EIR was released in 2005, LAWA expected that by 2015, unconstrained passenger demand at LAX would be 97.9 MAP—nearly 40 MAP higher than actual passenger operations in 2005. LAWA stated that the Master Plan improvements would prevent the LAX airfield, terminals and roadways from experiencing "complete breakdown." LAX Master Plan FEIS/FEIR at p. 3-27. The Master Plan would also accommodate additional passenger demand:

As the existing facilities are used beyond their design capacity ... increased congestion [will occur] within the passenger terminals, the various surface roads on and around the airport, and on the airfield itself. The consequences of taking no action to solve this problem will result in a loss of air service and declining economic benefits (jobs) to the Los Angeles region. Air service and economic benefits would likely relocate to other regions both within the state of California and to other states. Therefore, any comprehensive solution to meeting the regional demand for transportation over the next two decades must include improvements at LAX.

*Id.* at p. 1-34. Without the Master Plan improvements, airlines would "[s]hift connecting passengers to other airports in their networks." *Id.* at 2-9. More specifically, "[a]irlines will likely focus more of their LAX international air service on O&D [origin and destination] passengers and shift more of their connecting international passengers to

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other gateways in their network,” thereby jeopardizing LAX’s position as a leading airport for international connecting passengers. *Id.*

The Master Plan EIS/EIR extensively acknowledged the need to upgrade airport infrastructure and facilities to maintain LAX’s standing as a world-class airport. Not only would expanding the runway systems enable passenger growth (*id.* at p. 3-58), but so would expanding the terminals by adding new passenger gates:

The airport’s most limiting constraints are in the areas other than the airfield. The passenger terminal space and the number and size of the aircraft gates are inadequate to accommodate not only the number of passengers and aircraft, but also the large aircraft now being used and those that the airlines expect to introduce in the next couple of decades.

*Id.* at p. 2-7.

LAWA reasoned that although the Master Plan projects would enable LAX to accommodate an increase in passenger demand over then-current operations, the Master Plan would eventually limit passenger operations in 2015 to LAX’s 2005 practical capacity of roughly 79 MAP. *See id.* at p. 3-57 (“Constraining the aircraft gate frontage at the terminals . . . place[s] an effective constraint on total passenger activity at LAX.”); *id.* at p. 2-8 (LAX’s “practical capacity acts as a barrier to growth in activity because airport users (airlines and passengers) will not tolerate excessive levels of delay or reduced levels of service. Over time, airport users will change their behavior.”). LAWA assumed a level of operations of 79 MAP for the environmental impact analysis of the Master Plan project at buildout.

By 2015, neither passenger demand nor actual operations had quite reached the anticipated levels, possibly due to the effects of September 11 and the 2008 recession. Instead, actual operations came to just under 75 MAP. After 2015, however, passenger activity at LAX rose to nearly 90 MAP. Whereas in 2005 LAWA believed that limiting terminal capacity would effectively “cap” passenger operations, around 2012—in the final years before the Master Plan’s 2015 horizon—LAWA began taking a different position toward the relationship between capacity and growth. Thus, despite stating in 2005 that terminal, airfield and curbside constraints directly limit passenger growth, LAWA’s mantra today is that such improvements (perhaps with the unique exception of a new runway) have an insignificant effect on passenger growth because “enhancements in passenger convenience . . . are not primary considerations in passengers’ decisions to

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travel to, or from, LAX, and how often they travel.” LAMP Draft EIR at p. 6-8.<sup>23</sup>

In 2013, LAWA applied this theory to the MSC Program/MS North Project, which in its first phase constructs a new, freestanding 15–passenger gate concourse west of TBIT, as well as the new Crossfield Taxiway C-14. MSC Program DEIR. LAWA claimed that the MSC North Project would “not increase passenger or gate capacity, nor flights and/or aircraft operations at LAX.” *Id.* at p. 4.4-160. LAWA has furthermore claimed that the 8 additional gates that would be built in phase two of the MSC Program (i.e. MSC South) “would not increase operations at LAX, but would provide LAWA with the flexibility to accommodate existing demand.”<sup>24</sup> Exhibit 6, Ricondo MSC South Memo.

In 2014, LAWA again took this approach with its Runway 6R/24L Runway Safety Area (“RSA”) Project, which would among others things relocate the western physical end of Runway 6R approximately 200 feet to the east and shift the Runway 24L endpoint approximately 800 feet to the east. 6R/24L RSA Project Final MND.<sup>25</sup> LAWA claimed that the project “would not result in increased or decreased aviation activity at LAX” (*id.* at p. 4) “nor would it affect the number or type of aircraft that operate at LAX” (*id.* at p. 29).

In 2016, LAWA again took this approach with its Runway 7L/25R Safety Area Improvements and Pavement Rehabilitation Project, which would among other things extend the runway by 832 feet and repair the pavement on Taxiway B and the east end of Runway 25R/7L. 7L/25R RSA Project Final EIR.<sup>26</sup> LAWA claimed that the project

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<sup>23</sup> Available at <https://www.lawa.org/en/lawa-our-lax/environmental-documents/current-projects/lamp-deir>; last accessed Feb. 9, 2021.

<sup>24</sup> After approval of the original proposed 11-gate MSC North Project in 2014, in 2015 and 2016 LAWA added an additional 4 gates to the project with no CEQA notice to the public other than the 72-hour notice required under the Brown Act. MSC Addendum – Remote Transmitter/Receiver (RTR) Facility; MSC Addendum – North Extension and Gateway Facility (available at <https://www.lawa.org/lawa-msc-north/project-documents>; last accessed Feb. 9, 2021). See Part III, *infra*.

<sup>25</sup> Available at <https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/runway-6r24l-runway-safety-area-improvements-project>; last accessed Feb. 9, 2021.

<sup>26</sup> Available at <https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/runway-7l-25r-runway-safety-area-and-associated-improvements>; last accessed Feb. 9, 2021.

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“would not affect the number or type of aircraft operations at the airport.” *Id.* at p. 2-15.

In 2016, LAWA again took this approach with its Terminal 1.5 Project, which among other things would add a new passenger processing building between Terminals 1 and 2 in order to “ease congestion” and provide “connectivity” between the two terminals. Terminal 1.5 Project Final MND.<sup>27</sup> LAWA claimed that the project “would not increase overall passenger capacity or affect aircraft operations at LAX.” *Id.* at B-27.

In 2017, LAWA again took this approach with the Terminals 2 and 3 Modernization Project, which would double the square footage of Terminals 2 and 3 and add three new passenger gates. Terminals 2 and 3 Modernization Project Draft EIR.<sup>28</sup> LAWA claimed that “the proposed improvements to, and additional floor area proposed for, T2 and T3 would also not increase operations or passenger volumes beyond what would occur without the project.” *Id.* at 2-27.

In late 2018, LAWA again took this approach with the United Airlines East Aircraft Maintenance and Ground Support Equipment Project, which would expand the existing eastern United aircraft maintenance area lease and “redevelop” approximately 38 acres for a new maintenance facility and additional aircraft parking positions, among other things. UAL East Aircraft Maintenance Draft EIR.<sup>29</sup> LAWA claimed that the project “would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and would not affect terminals, the number of gates at LAX, gate frontage, taxiways, or runways.” *Id.* at p. 1-3.

In 2020, LAWA again took this approach with the Terminal 4 Modernization Project, which would among other things renovate/expand Terminal 4, realign Taxilane C9, and reconstruct the Terminal 4 apron area. Terminal 4 Modernization Project Final MND (available at <https://www.lawa.org/lawa-our-lax/environmental-documents/current-projects/terminal-4-modernization-project>; last accessed Feb. 9, 2021). LAWA claimed that the project “would not result in an increase in number of passengers or aircraft operations at LAX.” *Id.* at 4-6.

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<sup>27</sup> Available at <https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-15>; last accessed Feb. 9, 2021.

<sup>28</sup> Available at <https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-2-and-3-modernization>; last accessed Feb. 9, 2021.

<sup>29</sup> Available at <https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/united-airlines-east-aircraft-maintenance>; last accessed Feb. 9, 2021.



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In 2020, LAWA again took this approach with the Terminal 6 Renovation Project, which would among other things, realign the existing 13 aircraft gates and 1 bus gate to accommodate 15 aircraft gates and a new bus gate. Terminal 6 Renovation Project Final MND (available at <https://www.lawa.org/lawa-our-lax/environmental-documents/current-projects/terminal-6-renovation-project>; last accessed Feb. 9, 2021). LAWA claimed that the “reconfiguration proposed as part of the T6 Renovation project would not increase aircraft operations at LAX.” *Id.* at 34.

By abandoning a forward-looking approach to airport development (i.e., establishing a target for LAX’s practical capacity and basing environmental review on projected future operations, like LAWA did with the LAX Master Plan), LAWA is instead developing LAX in “piecemeal” fashion. LAWA justifies each expansion project with the claim that it will not cause operations growth and is needed merely to improve the “passenger experience.” Yet, between 2010 and 2020, the number of annual aircraft operations at LAX grew by roughly one third. LAWA wants the public, and decisionmakers, to believe that this growth has *nothing* to do with the last 10 years of expansion at the airport. LAWA has taken the permanent position that no matter what it does at the airport, LAWA *never* has to analyze a project’s effect on operational capacity because capacity does not change as a result of LAWA’s actions.

For reasons explained earlier, LAWA’s position with regard to each project is neither credible nor backed by evidence, and thus violates CEQA. Further, LAWA’s strategy of avoiding full CEQA review for all of these projects, including the ATMP, is aided by the fact that LAWA systematically ignores the cumulative effect of all of these projects on operational capacity. Although each environmental document cited in the list above contained a cumulative impacts discussion pursuant to CEQA, none of these documents discussed these and other past, present and future projects’ cumulative effect on *aircraft operations*, which have direct, calculable impacts on the environment. This also violates CEQA. Were this cumulative effect properly analyzed and disclosed, the environmental impacts from the last 10 years of expansion, as well as from the Project, could be properly evaluated.<sup>30</sup>

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<sup>30</sup> Of particular note, the DEIR fails to identify the United Airlines East Aircraft Maintenance and Ground Support Equipment Project (which, according to its associated EIR, would now be nearly built) in its analysis of cumulative impacts; similarly, the cumulative impacts analysis for that project ignored the ATMP. The omission of the ATMP from that analysis violated CEQA; as documentary evidence cited throughout (footnote continued on next page)

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LAWA has avoided looking at its expansion efforts' cumulative effect on aircraft operations by steadfastly refusing to update the 2004 LAX Master Plan. *See* Part V.F. Airport development is a long-range planning process; airports do not come up with each successive project in a vacuum. Yet, by avoiding updating its Master Plan, and by ignoring the individual and cumulative effect of projects' impacts on operations, LAWA has effectively "piecemealed" a decade of capital improvement projects in order to avoid disclosing their true impact on the surrounding communities and the environment.

In sum, LAWA has been engaging in an illegal pattern and practice of avoiding disclosure of projects' true operational impacts, in violation of CEQA. The Project is the latest example of LAWA's systematic effort.

**E. The DEIR Contains No Evidence that the Project Would Not Remove Ground Access Constraints to Passenger/Operations Growth, Including After 2033.**

As El Segundo has emphasized to LAWA before, the environmental analysis required by CEQA may not simply assert that alleviating the significant and longstanding ground access constraints at LAX will have no effect on airport operations. *See* DEIR, Appendix B.1 at p. 4-6 (claiming that airport roadway congestion does not present an obstacle to passenger growth).

The DEIR ignores this effect of the Project by claiming that the landside component is expected to be able to accommodate passengers in FY 2028 and FY 2033; moreover, the DEIR simply assumes this will continue to be the case *after* 2033. DEIR, Appendix B.1 at p. 4-6. Yet the DEIR fails to provide substantial evidence for these assumptions. In the CEQA context, substantial evidence means "enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might also be reached. . . . Argument, speculation, unsubstantiated opinion or narrative, evidence which is clearly

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these comments makes clear, LAWA's planning for the ATMP was already well underway at that time (late 2018), and thus the Project was reasonably foreseeable. Furthermore, given El Segundo's proximity to United's southern airfield operations, we are concerned about LAWA's failure *ever* to undertake a comprehensive analysis of the gradual expansion of United's aviation, maintenance and related operations in the southeastern portion of the airport, including but not limited to the cumulatively considerable air quality and other impacts from the United project's substantial grading. LAWA's failure to do this violates CEQA.

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erroneous or inaccurate . . . does not constitute substantial evidence.” CEQA Guidelines § 15384(a).

The DEIR asserts that ground access has no bearing on airport capacity, thereby attempting to portray the role of ground access in passenger operations in black and white. This mischaracterizes what is in fact a very complex issue, particularly at LAX. As Adib Kanafani explains in his memorandum prepared in connection with the LAMP DEIR (Exhibit 11, 2016 Kanafani Comments on LAMP Ground Access), LAWA failed to support the assertion that the LAMP would not enable any portion of the projected growth in passenger capacity. As the 2016 Kanafani Comments described, each component of the airport, including the passenger terminals, the airfield, and the ground access system, is a “link in a chain,” and the link with the lowest capacity “determines the capacity of the whole system.” *Id.* at p. 1. Passengers, in particular domestic travelers who have a variety of other options in the LA region for airports that provide domestic flights, take traffic congestion (along with other factors) into account when they choose an airport, particularly when congestion gets very high.

Indeed, the data cited in the ATMP DEIR’s discussion of this issue states that ground access *does* play a role in prospective passengers’ decisionmaking, thereby contradicting the assertion that removing ground access constraints will not enable passenger growth. *See* DEIR, Appendix B.1 at 4-6 (citing report of the Transportation Research Board of the National Academies, Airport Cooperative Research Program, which finds that that “[s]urface access issues . . . remain[] a primary passenger choice driver in the Los Angeles Basin. Given the presence of several regional facilities across the area, the traffic situation in the Basin drives the airport choice for a large proportion of travelers.”). Other sources echo this finding; a 2013 report by the Eno Center for Transportation (“Eno Report”) finds that “[g]round access to the airport at LAX is the most significant chokehold in the airport’s system and according to [LAWA] airport access infrastructure was projected to hit complete gridlock at 78.9 million annual passengers without improvements to the system.” 2013 Eno Report at p. 18.<sup>31</sup> Similarly, the Southern California Association of Governments (“SCAG”) 2040 Regional Transportation Plan/Sustainable Communities Strategy (“2040 RTP/SCS”) states that “[p]assengers’ choice of airports is based in part on the travel time to the airport and the convenience of access, so facilitating airport access is essential to the efficient functioning of the aviation system.” Exhibit 12, 2016-2040 RTP/SCS Aviation & Airport

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<sup>31</sup> Available at [www.ustravel.org/sites/default/files/media\\_root/USTravel\\_Eno\\_1.pdf](http://www.ustravel.org/sites/default/files/media_root/USTravel_Eno_1.pdf); last accessed Feb. 9, 2021.

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Ground Access Appendix at p. 22.

LAWA itself has previously asserted that the ground access system is a significant constraint on passenger operations at LAX, and that it would need to be relieved to enable growth in passenger operations. The 2004 Master Plan, which considered an unconstrained demand forecast of 98 MAP in 2015 and evaluated four alternative plans under this demand scenario, stated that the No Action/No Project Alternative (i.e., no Master Plan adopted) would limit passenger operations at LAX to 78 MAP because of the airport's "constrained curbs and roadways." LAX Master Plan FEIR/FEIS at Figure 1.2-1. By contrast, the alternatives that included LAMP components would have permitted up to 98 MAP. *Id.*; *id.* at 1-4 ("The [No Project] Alternative is limited by the capacity of the curbside in the Central Terminal Area ("CTA") where passengers are dropped off and picked up in front of the existing terminals. The resulting annual passenger performance measure of this alternative is approximately 78 million.").

Although this evidence directly contradicts LAWA's assertion that the proposed removal of ground access constraints with the Project will not contribute to the higher passenger forecast at LAX in the forecast years, the DEIR does not accurately disclose the relationship between ground access and aircraft operations. LAWA's counterargument that ground access simply is not a constraint on airport capacity, and therefore improving ground access efficiency would not affect airport capacity or operations, is incorrect and not supported by substantial evidence in the record. As a result, the DEIR fails to justify its omission of analysis of environmental impacts related to higher passenger operations enabled by the Project, including increased aviation noise, traffic, air quality and GHG impacts.

**F. The DEIR Lacks Evidence for Its Claims that the Airport Without the Project Could Accommodate the Same Operations/Year as With the Project in 2028, 2033 and 2045.**

In addition to misleading the public and decisionmakers that the Project would not affect aircraft operations because the Project would only result in a delay savings of roughly 1 minute in 2028, LAWA also assumes that the level of aircraft operations in 2028, and 2033 and 2045 would be the same with or without the Project. The DEIR lacks substantial evidence for this assumption. Furthermore, the DEIR states that the hypothetical "Without Project" scenario was created for the "informational" purpose of showing that operations under the "With Project" scenario would be the same as "Without Project" in 2028, and therefore that the Project essentially has no operational impacts. Yet, this hypothetical "Without Project" scenario contains serious flaws, for the

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reasons explained below. Thus, rather than having “informational” value, this scenario misleads the public about the Project’s actual impacts.

**1. The DEIR Assumes Without Evidence that LAX Could Accommodate 853,000 Annual Operations in 2045 Without the Project.**

LAWA assumes that even if the Project were not built, due to the many other capital improvements that will be up and running, the airport could accommodate 853,000 annual aircraft operations by 2045. DEIR, Appendix B.1, Table 4-1 at p. 4-11. Yet the only evidence LAWA provides for this claim is the statement that “[s]everal terminal facilities at LAX have been in the process of being modernized to ensure the ability of aging terminal facilities and passenger processors to accommodate demand for air travel, [including] Midfield Satellite Concourse, Terminals 2 and 3 Modernization Project, and LAX Terminal 1.5 Project. Therefore, existing and planned terminal facilities would provide adequate processing facilities for all existing and planned passenger gates in FY 2028 and FY 2033.” *Id.* at p. 4-6.<sup>32</sup>

As an initial matter, there appears to be a calculation error in the DEIR’s claim that the airport could accommodate all forecasted constrained demand in 2045 without the Project. Appendix B.1, Table 4-1 states that at 853,000 operations in 2024, LAX would be processing 127.9 MAP. However, the Kanafani Report finds that the assumptions used to convert forecasted operations to MAP (percent of operations that are scheduled passenger service (90%), average load factor (90%), and average seats for departure (190)), when applied correctly, result in a conversion from 853,000 operations/year to 131 MAP, more than 3 MAP higher than the level the DEIR claims is the *maximum* passenger traffic the airport could accommodate without the Project in 2045. Kanafani Report at p. 2. The Kanafani Report further notes that the use of two different average seats for departure assumptions for the constrained scenario (190) versus the unconstrained scenario (204) is unjustified; if the constrained scenario reflects

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<sup>32</sup> El Segundo’s November 24, 2020 PRA request asked for “all documents supporting the statement that existing facilities could accommodate 127.9 MAP, including, but not limited, to evidence for the statement on p. 4-6 of Appendix B.1 to the DEIR that ‘existing and planned terminal facilities would provide adequate processing facilities for all existing and planned passenger gates in FY 2028 and FY 2033.’” LAWA’s response to this request—which, curiously, LAWA also provided in response to the PRA request described in footnote 17, *supra*—does not substantiate the quoted statements from the DEIR. LAWA therefore lacks substantial evidence for this claim, in violation of CEQA.

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airlines' response to increase delays by increasing seating densities and load factors, then the average seats per departure should be *higher* under constrained conditions. The Kanafani Report concludes that “this casts doubt about the validity of the forecast numbers and requires correction, and a clarification of the assumptions used about the relation between flight operations and passenger traffic forecasts.” *Id.*

Furthermore, it is not enough for LAWA to assert that “existing and planned terminal facilities would provide adequate processing facilities” in 2028 and 2033 in order to avoid analyzing *any* of the Project’s operational impacts. LAWA would also have to show that existing and planned terminal and *airfield* facilities would provide adequate infrastructure for all forecasted passenger levels and aircraft operations after 2033, including in 2045; for the reasons already explained above, LAWA cannot do so. Moreover, LAWA’s statement that MSC and the Terminals 1.5, 2 and 3 modernizations would enable LAX to accommodate planned passenger gates/fleet mixes by 2028 and 2033 without the Project is an admission that these projects do expand LAX’s operational capacity, despite LAWA’s denials in the associated CEQA documents.

Although LAWA claims that both SCAG and FAA data independently verify LAWA’s aviation forecast, including LAWA’s assertion that the existing facilities in 2045 (without the Project) could accommodate 127.9 MAP, this is false. SCAG’s current RTP/SCS states that its 2045 passenger forecasts by airport were “provided by SCAG region airports” (i.e., LAX and other airports), not independently developed. *See* 2020-45 SCAG RTP/SCS Aviation and Airport Ground Access Technical Report, Table 12 at p. 33;<sup>33</sup> *id.* at p. 32 (stating the “regional aviation forecast involved . . . airport-level numbers based on capacity constraints and analyses provided by the airports, which were then totaled up to a regional level.”). LAWA thus cannot rely on SCAG’s RTP/SCS as independent verification of LAWA’s aviation forecast.

It also bears noting that, the last time LAWA relied on a long-range passenger forecast in an environmental document—in the 2016 LAMP EIR—LAWA claimed that the effective passenger capacity of LAX was 96.6 MAP, based on the purported “airfield constraint” at the time. Exhibit 12, 2016-2040 RTP/SCS Aviation & Airport Ground Access Appendix at p. 20. LAWA and SCAG asserted that this represented the effective maximum capacity of LAX “limited by the [four-runway] airfield.” *Id.* However, “[a]lternative runway configurations, (e.g., Alternative A or B in the LAX Master Plan)

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<sup>33</sup> Available at [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_aviation-and-airport-ground-access.pdf?1606001540](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_aviation-and-airport-ground-access.pdf?1606001540); last accessed Feb. 9, 2020.

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could yield higher airfield capacities.” *Id.* Both Master Plan Alternatives A and B proposed an additional *fifth* runway at LAX. Even though neither the LAX airfield, nor the airport’s operating procedures, has materially changed since 2016, the DEIR claims that the airport could accommodate nearly 111 MAP in 2028 under without-Project conditions. The fact that LAWA’s own passenger forecast jumped by nearly 15 MAP in just a few years, based on identical facilities, casts serious doubt on LAWA’s assertions regarding the airport’s capacity with or without the Project. The DEIR must explain this significant discrepancy, which, on its face, appears to confirm LAWA’s pattern and practice of claiming projects will not affect existing capacity at the time they are proposed, yet revealing *after* they are approved that capacity nonetheless increased.

Similarly, although FAA determined that LAWA’s aviation forecast through 2028 (10 years from the baseline year) is consistent with FAA’s Terminal Area Forecast (“TAF”), FAA made no consistency determination regarding LAWA’s 2045 aviation forecast, which looks more than twice as far into the future. *See* DEIR, Appendix B.1 at p. 3-2, fn. 9 (ATMP forecast is “considered consistent with the TAF if the results differ by less than 10 percent in the 5-year forecast period, and 15 percent in the 10-year forecast period.”). Thus, the DEIR’s claims that FAA has “acknowledged” that deviations between actual future activity levels and LAWA’s “long-term forecast period through 2045” are “expected” (*id.* at 3-2), and that FAA deemed LAWA’s long-term forecast “consistent” with the TAF for the purposes of the Project (DEIR, Appendix B.1, Attachment A at p. A-1), are inaccurate. FAA’s consistency determination is not substantial evidence of the accuracy of LAWA’s aviation forecast through 2045.

## **2. The DEIR Improperly Assumes the Simultaneous Operation of the 23-Gate MSC and Existing 18 West Remote Gates for Purposes of the “No Project” Aviation Forecast.**

LAWA also claims that existing/planned facilities’ alleged ability to accommodate growth is “evidenced by the fact that flight schedules developed to support airfield simulation efforts for FY 2028 and FY 2033 were successfully gated, and that existing and planned passenger gates at LAX can accommodate the FY 2028 and FY 2033 projected aircraft fleet mixes.” DEIR, Appendix B.1 at p. 4-6. This “gating analysis” contains substantial flaws with regard to its conclusion about the ability to accommodate growth in 2028 and 2033, as well as in 2045.

First, the “gating analysis” assumes the construction of 8 gates at MSC South, despite the fact that the MSC South Project has not been approved yet, and in fact is the subject of a detailed CEQA comment letter submitted by El Segundo and never addressed

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by LAWA. LAWA's "gating analysis" further errs by assuming that the current 18 West Remote Gates ("WRG") will still be operating as a bus gate facility in 2028 and 2033. DEIR, Appendix B.2 at p. 2-2. As explained earlier, LAWA has repeatedly committed to decommissioning *all* of the WRGs once the MSC is built. Thus the gating analysis cannot assume the simultaneous operation of *both* the 23-gate MSC and the 18 WRGs, to make it look as though the airport without the Project could accommodate the same level of growth as if the Project were approved. *See* DEIR, Appendix B.2, Exhibit 2-2 (showing 23 MSC gates, and all 18 current WRGs, in operation under the hypothetical "No Project" Scenario in 2028).<sup>34</sup>

By padding this hypothetical "No Project" scenario with at least 18 additional gates that would not actually exist in 2028 or after, LAWA fails to carry its burden to show that the Project would not alleviate existing constraints on capacity. LAWA must therefore analyze and disclose the environmental impacts from the Project's effect on accommodating growth.

**3. The DEIR's "Without Project" Scenario Suffers from the Same Flaws as the "No Project" Scenario and Thus Has No "Informational" Value.**

The DEIR's "Without Project" scenario, supposedly provided for the purely "informational" purpose of claiming that environmental impacts would be the same with or without the Project, is misleading for the same reasons as discussed in Part II.F.2. LAWA must revise the "Without Project" scenario to omit the MSC South Project and

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<sup>34</sup> In response to El Segundo's November 24, 2020 PRA request, LAWA provided what appear to be portions of its "gating analysis," including several simulation ("SIMU14") files which we are unable to access. However, the portions of this disclosure which we are able to open indicate that LAWA has only conducted this "gating analysis" through 2033. Thus, based on the limited data LAWA has provided in the DEIR and in response to El Segundo's PRA request, there appears to be no evidence for the DEIR's assumption that the airport without the Project could accommodate the constrained demand forecast in 2045. *See* Kanafani Report at p. 4 ("Summary and Recommendation"). Without such evidence, LAWA cannot claim that the Project will not alter the constrained forecast by delaying the slowdown in growth. Furthermore, it is unclear whether the gating analysis takes into account the fact that passenger gates at LAX are not fungible, and thus any capacity remaining at some gates cannot necessarily absorb overcapacity at other gates. Unless the gating analysis reflects this reality it is not evidence of LAX's ability to accommodate growth without the Project.



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the 18 WRGs, and reevaluate whether environmental impacts are actually different under each scenario.

Additionally, the DEIR does not define the “Without Project” scenario or describe what future conditions it assumes. LAWA must disclose a complete list of all of the infrastructure improvements it is assuming would exist under the Without Project scenario.

### **III. The DEIR Fails to Justify the Proposed Taxiway C Extension’s Connection to the Project, or Disclose Its Impact on Overall Airport Capacity and the Environment.**

The Project would include various improvements and modifications to existing taxiways near the proposed Concourse 0 and Terminal 9 to facilitate aircraft access to and from the gates at those facilities. However, the DEIR is severely lacking in its description of these improvements, in particular the proposed extension of Taxiway C from Taxiway C3 to Taxiway B1. Furthermore, although El Segundo in its comments on the NOP stated that the DEIR must include a full description of proposed Taxiway C extension’s effect on operational efficiency and the associate impacts, the DEIR fails to do so.

LAWA has proposed the Taxiway C extension previously, including as an alternative to the 2014 Runway 7L/25R RSA and Associated Improvements Project. *See* LAX Runway 7L/25R RSA Project and Associated Improvements, Initial Study at pp. 13-14, 26.<sup>35</sup> Yet LAWA has never adequately demonstrated the need for, or purpose of the extension or shown that the extension would not impact El Segundo residents. Due to objection by El Segundo, the extension was ultimately deleted from the Revised Draft EIR for the Runway 7L/25R Project. El Segundo believes LAWA lacks justification to include the Taxiway C extension in the ATMP and objects to its inclusion—in part, because it could exacerbate the existing usage imbalance between the north and south runway complexes.

The DEIR’s description of the proposed extension is fatally flawed and the document does not analyze how this Project component would impact El Segundo. If LAWA intends to keep the Taxiway C extension, it must first revise the DEIR to include

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<sup>35</sup> Available at <https://www.lawa.org/lawa-our-lax/environmental-documents/documents-certified/runway-7l-25r-runway-safety-area-and-associated-improvements>; last accessed Feb. 9, 2021.

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this information and analysis.

**A. LAWA Has Long Wanted to Build the Taxiway C Extension.**

Once again, LAWA is proposing to extend Taxiway C for reasons that are not disclosed and which have no discernable connection to the larger Project.<sup>36</sup> In 2012, El Segundo commented that the Runway 7L/25R RSA Project EIR failed to adequately explain the linkage between the RSA improvement and this “associated improvement,” and that if LAWA had another reason for extending Taxiway C, LAWA must disclose that reason.

LAWA’s failure to explain why it needs the Taxiway C extension here suggests that LAWA is trying to surreptitiously slip this long-desired airfield improvement into the ATMP without acknowledging its impacts to operational capacity or land uses to the south of the airport. This perception is underscored by the fact that the DEIR contains no more than the following regarding the proposed Taxiway C extension: “Other related airfield improvements that would support Terminal 9 include the . . . easterly extension of Taxiway C from Taxiway C3 to Taxiway B1 . . . the relocated/extended Taxiway C would be designed at ADG VI separation from Taxiway B.” DEIR at p. 2-28. Furthermore, this cursory description of the Taxiway C extension is misleadingly buried in the description of Terminal 9 (section 2.4.2.2), rather than in the separate DEIR section describing, with a 2-page narrative, other “airfield elements” including the Taxiway D extension and the proposed Runway 6L/24R exits (section 2.4.1).

Based on historical documents, El Segundo believes that LAWA wants to finally build the Taxiway C extension to alleviate the longstanding problem of departing aircraft “queuing” on Taxiways C and B such that they interfere with passenger enplanement/deplanement at Terminal 8. Furthermore, since Terminal 9 would be built between Terminal 8 and the east end of Runway 7L/25R, this queueing could interfere with enplanement/deplanement at Terminal 9 as well. Prolonging the time it takes for departing/arriving flights to pull away from/arrive at these passenger terminals could further contribute to airfield delay that LAWA admits would occur without the Project; moreover, the DEIR fails to clearly state that the addition of Terminal 9 and these new aircraft operations would exacerbate the existing queueing problem if the Taxiway C extension were not built. *See* DEIR at p. 2-28 (vague statement that the proposed Taxiway C extension would “support” operations at Terminal 9). The Taxiway C

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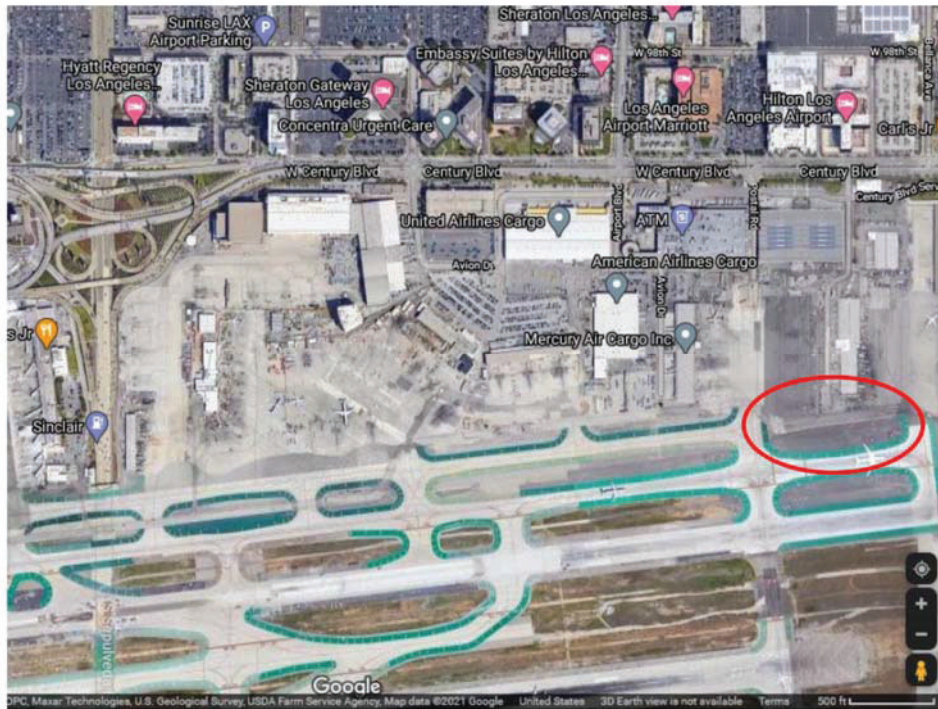
<sup>36</sup> Notably, the 2004 LAX Master Plan does not call for the proposed extension of Taxiway C.

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extension thus would help alleviate delay.

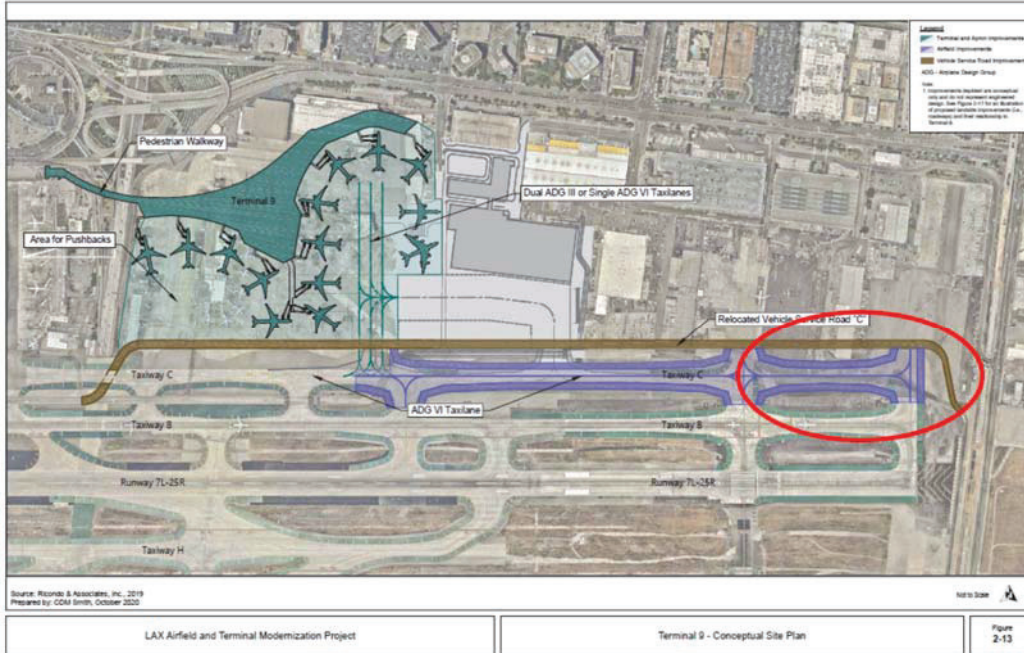
LAWA previously indicated this reason for the Taxiway C extension in a study that El Segundo requested as part of the Runway 7L/25R RSA environmental review process. There, LAWA stated that shifting the runway to the west (as proposed by El Segundo as its preferred alternative to the proposed RSA project), which would obviate the need for the Taxiway C extension, would shift the departure queue on Taxiways B and C to the west and thus “may block gates” at Terminal 8. Exhibit 13, January 29, 2015 Runway Shift Study at slide 8. Queuing on Taxiways B and C is particularly problematic for LAX because “[m]ost aircraft that utilize the South Airfield for departure begin that process on Runway 25R and its connecting taxiways. As such, this portion of runway and its associated taxiways handle a large amount of traffic.” 7L/25R RSA Project DEIR at p. 2-11.

Existing condition (from Google Maps, last accessed December 8, 2020):

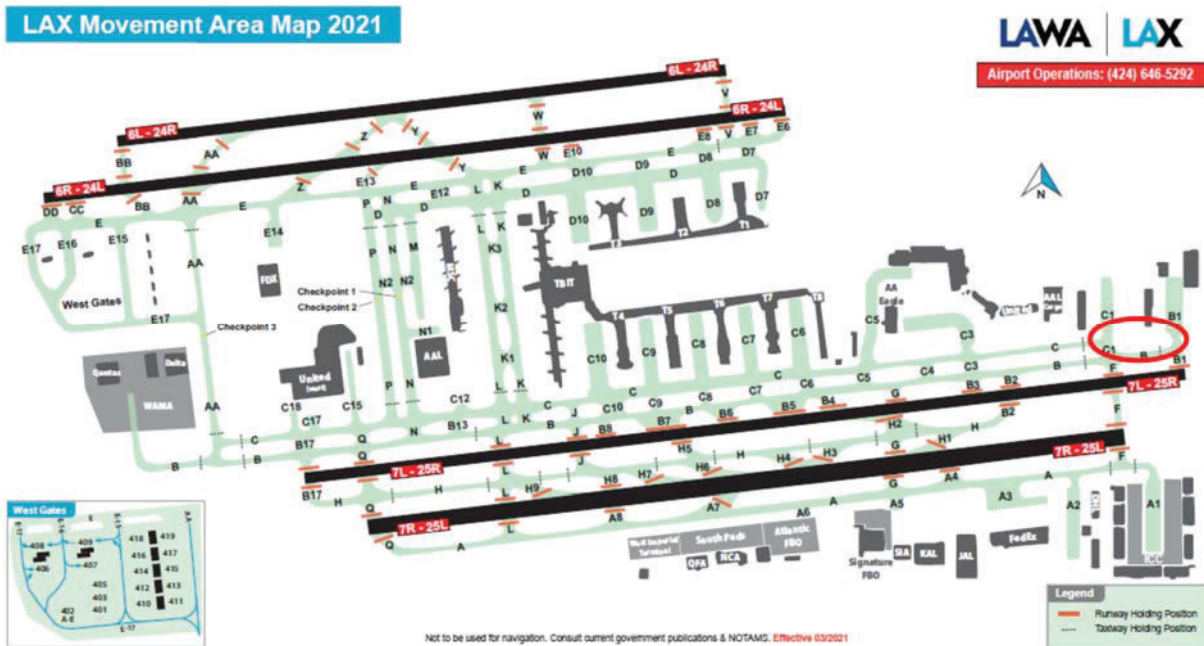


Proposed condition (DEIR, Fig. 2-13):

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LAWA diagram with taxiway designations (available at <https://www.lawa.org/-/media/lawa-web/group-and--division/files/lawa-airport-operations/airfield/airfieldmap.ashx>; last accessed February 22, 2021):



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LAWA further described the design and purpose of the proposed Taxiway C extension in a March 2015 report, yet none of the description from this report is reflected in the DEIR. There, LAWLA stated that “[e]xtending Taxiway C . . . may enhance FAA air traffic control’s ability to use Runway 25R for departures in lieu of Runway 25L by providing a *second access point to the Runway 25R end*. The Taxiway C extension would ease air traffic control’s ability to transition aircraft from Taxiway A to a departure queue on Taxiway B and Taxiway C.” Exhibit 14, March 2015 Runway Shift Study Final Report at p. 6. Furthermore, currently, “[t]he departure queue often extends west beyond Taxiway C6, resulting in congestion and delay for aircraft waiting to taxi to or push back from gates at Terminal 7 and Terminal 8.” *Id.* at p. 60. Air Traffic Control “expressed their support for the Taxiway C extension on numerous occasions noting that it would improve their ability to efficiently manage departures and would ease access to Runway 25R from Taxiway A.” *Id.* at p. 82 (listing “benefits . . . associated with the Taxiway C extension,” including “[l]arger queue area to stage for Runway 25R,” “reduce[d] aircraft idle time on Taxiway A,” and “enhance[d] access to the B1 aircraft parking apron even when aircraft are queued for departure.”).

In sum, the DEIR must clearly state the purpose and need for the Taxiway C extension and properly describe it as an “airfield element” of the Project.

**B. The DEIR Fails to Adequately Disclose the Gains in Operational Capacity from the Proposed Taxiway C Extension.**

The DEIR’s mislabeling of the proposed Taxiway C extension as a “terminal element” instead of an “airfield element” is more than a quibble over semantics. Because of LAWLA’s misidentification, the public and decisionmakers should doubt that the aviation growth analysis properly accounted for the proposed Taxiway C extension in calculating the reduction in operational delay attributable to the Project. DEIR, Appendix B.2, Exhibit 3-2. That analysis, in discussing how the Project’s reducing effect on airfield delay was calculated, states only that the proposed “airfield modifications and improvements,” specifically, the Taxiway D extension and the proposed additional Runway 6L exit taxiways, were used to calculate the reduction in delay. DEIR, Appendix B.2 at p. 3-7. Because the DEIR does not classify the Taxiway C extension as an “airfield element,” LAWLA appears to have omitted it from the delay reduction analysis.

As LAWLA has previously acknowledged, runway or taxiway upgrades, or changes to arrival/departure procedures, “could, in some circumstances, entail changes in the number of operations that LAX can accommodate.” Terminals 2 and 3 Modernization

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Project FEIR at p. 2-31; *see also Barnes v. U.S. Department of Transportation*, 655 F.3d at 1138-39.<sup>37</sup> There is thus no excuse for not specifically showing the effect that *each* of the Project's proposed airfield elements, including the Taxiway C extension, individually would have on operational capacity as a factor of airfield delay reduction.

Furthermore, the aforementioned 2015 study and other documents provide evidence (cited above) that the Taxiway C extension would increase operational efficiency, and thus capacity, on the south airfield. For example, currently, the south airfield has to partially shut down (i.e., hold aircraft ground operations) when very large aircraft such as the Airbus A380 come through. Exhibit 15, June 14, 2018 NASIP Update at pp. 20-22 (stating that "A380 movements [are] restricted in south airfield" but that the proposed Taxiway C extension would "[a]llow[] for A380 movements at [Terminal 9]."); *see also* LAWA ADG VI Operational Plan, dated April 20, 2020, at p. 12.<sup>38</sup> Making the proposed changes to Taxiway C would appear to reduce this problem by reducing the area where A380s cause conflicts with aircraft on nearby taxiways/runways. Exhibit 8, August 29, 2018 NASIP Briefing at p. 9 (stating that the Taxiway C extension would "[e]nlarge[] area where ADG VI operations do not impact operations on taxiways or runways.").

LAWA has failed to do the work in this DEIR to show that the taxiway upgrades and associated changes to arrival/departure procedures proposed as part of the Project would not influence the number of operations that LAX can accommodate. *See* Kanafani Report at p. 3, fn. 1 (DEIR must clarify whether Taxiway C is "identified explicitly as an input into the simulation modeling" depicted in Appendix B.2, Exhibit 3-2.). Furthermore, as explained in Part II, the modeling of delay savings attributable to the Taxiway C extension must be carried out to 2045, the same as the modeling and analysis of the Project's overall impacts.

In sum, despite El Segundo's comments on the NOP, the DEIR remains severely lacking in its description of the proposed extension of Taxiway C. The DEIR must include a full description of the proposed improvement and analyze its effect on

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<sup>37</sup> California courts treat federal case law interpreting the National Environmental Policy Act ("NEPA") as "persuasive authority when interpreting CEQA." *W. Placer Citizens for an Agric. & Rural Env't v. Cty. of Placer* (2006) 144 Cal.App.4th 890, 903, as modified on denial of reh'g (Dec. 11, 2006).

<sup>38</sup> Available at <https://www.lawa.org/-/media/lawa-web/group-and--division/files/lawa-airport-operations/lax-adg-vi-icao-code-f-operational-plan-final.ashx>; last accessed Feb. 9, 2021.

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operational efficiency and the associated impacts of increased operations.

#### **IV. The DEIR's Analysis of Project Alternatives Is Riddled with Errors.**

As explained earlier, the DEIR is fundamentally flawed due to its unsupported conclusion that Project impacts would be the same with or without the Project. This flaw is based in part on the failure to analyze Project impacts beyond 2028. If LAWA had done a proper impacts analysis, and disclosed the significant impacts associated with the increase in operational capacity made possible by the Project through 2045, this would show that substantially greater impacts would occur with the Project than without the Project. *See* Part II; *see generally* the Kanafani Report. The DEIR's failure to acknowledge the Project's significant impacts through 2045 renders the alternatives analysis meaningless.

Not only does LAWA's "gaming" of CEQA give the false appearance that this enormous expansion—comprising two new terminals, 29 new passenger gates, airfield efficiency improvements and roadway improvements—would effectively have *no* operational impacts compared to without the Project, but it also undermines the entire alternatives analysis. The core of an EIR is the mitigation and alternatives sections. *Preservation Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1350. Yet because of LAWA's refusal to acknowledge the Project's real impacts, the DEIR flips the alternatives analysis on its head, with the result that alternatives that are clearly environmentally superior to the proposed Project appear to be environmentally inferior.

Furthermore, instead of providing a "reasonable range" of feasible alternatives that would offer "substantial environmental advantages" over the Project, as CEQA requires, *all* of the DEIR's build alternatives allegedly would result in significant and unavoidable impacts, while none would appear to offer substantial environmental benefits over the proposed Project—not even the DEIR's "environmentally superior alternative," Alternative 4. This is the very definition of an unreasonable range of alternatives, and violates CEQA. Additionally, the DEIR relies on a misleading No Project Alternative designed to overstate the level of development and growth at LAX (and the associated impacts) that would occur with the absence of the Project.

##### **A. The Concourse 0 Only Alternative (Alternative 2) Is the Actual Environmentally Superior Alternative.**

"An EIR's discussion of alternatives must contain analysis sufficient to allow informed decision making." *Habitat & Watershed Caretakers v. City of Santa Cruz*

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(2013) 213 Cal.App.4th 1277, 1302-03. The DEIR fails in this regard. Of the proposed Project and the three build alternatives, Alternative 2 has by far the smallest footprint and would add the fewest passenger gate and airfield improvements to LAX. Relying on the false narrative that operational impacts would be effectively the same with the Project or any of the alternatives (including the No Project Alternative), the DEIR magnifies a relatively small difference between the Project and Alternative 2—namely, the air quality and GHG impacts from an alleged increase in airfield taxiing under Alternative 2, compared to the Project—in order to reach the absurd conclusion that Alternative 2 would have *more* impacts than the Project, even though it would entirely remove Terminal 9, its proposed 18 new passenger gates, and the proposed Taxiway C extension from the Project. DEIR at pp. 5-53 and 5-54 (alleged “new” Alternative 2 air quality impact); pp. 5-56 and 5-57 (alleged “new” Alternative 2 GHG impact).

The DEIR can only reach the conclusion that Alternative 2 has greater impacts than the Project by *ignoring* the proposed Project’s significant, operational impacts through 2045, which would vastly exceed the alleged air quality and GHG impacts from increased taxiing under Alternative 2. *See* DEIR at p. 5-102 (concluding that air quality/GHG impacts with the one-terminal, 11-gate Alternative 2 would exceed air quality/GHG impacts under the 2-terminal, 27-gate proposed Project).

Because the DEIR systematically diminishes the actual impacts of the Project while exaggerating the implications of alleged “new” impacts under much smaller alternatives, the DEIR’s alternatives analysis is fundamentally dishonest. For these reasons, moreover, the DEIR lacks substantial evidence that Alternative 2 is not the environmentally superior alternative—instead of Alternative 4, which would add a second terminal (Terminal 9) and would double the number of gates compared to Alternative 2.

**B. The DEIR Contains No Evidence that Would Support Rejection of Alternative 2.**

To ensure that alternatives are properly assessed, CEQA “contains a ‘substantive mandate’ requiring public agencies to refrain from approving projects with significant environmental effects if ‘there are feasible alternatives or mitigation measures’ that can substantially lessen or avoid those effects.” *Pres. Action Council*, 141 Cal.App.4th at 98; Pub. Resources Code § 21002. A lead agency may not reject an alternative unless the agency makes findings supported by substantial evidence showing that the alternative is infeasible. Pub. Resources Code §§ 21081(a), 21081.5; CEQA Guidelines §§ 15091(a)(3), 15092. Rejected alternatives must be “truly infeasible.” *City of Marina v.*



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*Bd. of Trustees of Cal. State Univ.* (2006) 39 Cal.4th 341, 369. “Feasible” means “capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.” CEQA Guidelines § 15364.

The alternatives analysis is so flawed that there is no way decisionmakers could lawfully reject Alternative 2 and approve the proposed Project instead. To summarize, LAWA asserts that the airport will be able to accommodate the current growth forecast regardless of the Project, and claims the Project is just needed to improve the “passenger experience.” Relying on this falsehood, the DEIR also makes the implausible claim that environmental impacts would actually be *higher* if just Concourse 0 were built, compared to if both terminals were built. The notion that half of the Project would have greater impacts than the whole Project is absurd; as logic dictates, if you double a project’s size, impacts will increase.

Nonetheless, even under these false premises, in order to approve the proposed Project LAWA still must demonstrate by substantial evidence that an alternative that is smaller than the full Project, for instance, Alternative 2, could not achieve the following objectives (DEIR at pp. 2-18 and 2-19):

- Provide for new modern, spacious, and efficient terminal facilities that support the ability to accommodate the projected future growth in passenger levels in a manner that offers operational flexibility
- Improve passenger experience, increase airlines’ efficiency, and reduce busing activity on the airfield through the removal and replacement of most of the West Remote Gates
- Improve international and domestic passenger processing capabilities
- Provide additional connections to the APM system currently under construction
- Provide connections to adjacent terminals that will allow passengers to move between terminals without having to go back through security screening
- Complete construction prior to the 2028 Olympics.

The DEIR utterly fails in this regard. It contains *no* evidence which decisionmakers could rely on to conclude that a smaller Project, for instance Alternative

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2 or a scaled-back version of both proposed new terminals, would not meet these Project objectives. CEQA requires agencies to explain their rejection of potentially feasible alternatives in a manner “sufficient to enable meaningful public participation and criticism.” *Save Round Valley Alliance v. County of Inyo* (2007) 157 Cal.App.4th 1437, 1458. Courts have repeatedly found that agencies fail to meet this standard when they reject alternatives based on unsupported conclusions. *Id.* at 1465; *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1305; *Center for Biological Diversity v County of San Bernardino* (2010) 185 Cal.App.4th 866, 884-85 (overturning FEIR in which an agency rejected an alternative based on unsupported, conclusory statements); *Pres. Action Council v. City of San Jose* (2006) 141 Cal.App.4th 1336, 1355 (finding that neither the EIR nor the supporting administrative record contained sufficient information to support the lead agency’s finding that a reduced-size alternative was infeasible).

Unsurprisingly, the DEIR provides no data or metric with which the public or decisionmakers could determine that building Concourse 0 and Terminal 9, as proposed, would improve the LAX “passenger experience” more effectively than just building Concourse 0, or a different scaled-back version of the Project. As explained in Part I, LAWA also cannot claim that the proposed Project is needed in order to replace some or all of the West Remote Gates. LAWA has already committed to decommissioning the WRGs once the MSC is completed, and furthermore assumed the draw-down of the WRGs, and a corresponding reduction in impacts, in the CEQA review for the MSC program and MSC North project. *See generally* MSC Program DEIR.

The DEIR furthermore contains no evidence for why additional passenger *gates* are necessary to improve the passenger *experience*. The DEIR lacks evidence that any of the alternatives could not adequately serve Olympics-related travel in 2028. Further, as explained earlier, the DEIR lacks evidence that under current pandemic conditions the Project could be completed by 2028; thus, none of the alternatives could be rejected in favor of the Project for this reason, either.

“To facilitate CEQA’s informational role, the EIR must contain facts and analysis, not just the agency’s bare conclusions or opinions.” *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1303. Under CEQA, LAWA must show by substantial evidence why the Project *as proposed* is necessary to achieve the objectives, as opposed to something smaller. The DEIR lacks any data or meaningful analysis on which a decisionmaker could reasonably rely to reject Alternative 2 or a different scaled-back version of the Project.

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### C. The DEIR Fails to Analyze a Reasonable Range of Alternatives.

Under CEQA, an EIR must consider a “reasonable range” of alternatives to the proposed project which (1) offer substantial environmental advantages over the proposed Project (Pub. Resources Code § 21002), and (2) may be “feasibly accomplished in a successful manner” considering the economic, environmental, social and technological facts involved. *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1302-03. A proper analysis of alternatives is essential for LAWA to comply with CEQA’s mandate that significant environmental damage be avoided or substantially lessened where feasible. Pub. Resources Code § 21002; CEQA Guidelines §§ 15002(a)(3), 1501(a)(2), 15126.6(a); see *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 565-65.

The DEIR carries over four alternatives from an original seven considered at the Project scoping stage. DEIR at pp. 5-6 through 5-11. One of these is the obligatory No Project Alternative, discussed in the following section. Each of the three remaining “build” alternatives—the “Concourse 0 Only Alternative” (Alternative 2), the “Terminal 9 Only Alternative” (Alternative 3), and the “LAMP Roadway Improvements plus Terminal 9 Access Alternative” (Alternative 4)—is essentially a variant on the theme of the Proposed project; each merely excises one major component of the proposed Project.

Despite CEQA’s mandate that the Project alternatives “offer substantial environmental advantages over the proposed Project,” LAWA has failed to do this here. *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1302-03. The DEIR asserts that other than the No Project Alternative, only one of the alternatives, Alternative 4, would reduce the Project’s significant impacts at all. Moreover, it would merely “reduce the severity of a significant but mitigable impact related to [roadway] construction noise and would *slightly* reduce the severity of the significant and unavoidable impact associated with increased passenger VMT.” DEIR at p. 5-102. In other words, Alternative 4, the “environmentally superior alternative” would not even reduce any Project impacts below the threshold of significance; all significant and unavoidable Project impacts would remain significant and unavoidable under Alternative 4. DEIR, Table 5-15.

With this DEIR, LAWA has inverted the purpose of the alternatives analysis. Instead of seeking out feasible alternatives that would offer “substantial environmental advantages” over the Project, as CEQA requires, LAWA has tweaked the proposed Project just enough with one alternative so that two significant impacts that would occur with the Project would be “slightly” reduced. *All* of the build alternatives would result in significant and unavoidable impacts, while none would offer substantial environmental

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benefits over the proposed Project, not even the “environmentally superior alternative.” *See id.* This is the very definition of an unreasonable range of alternatives, one in which the agency’s unwavering commitment to the proposed Project, rather than the reduction in significant and unavoidable impacts, is the guiding principle.

Under CEQA, project objectives cannot be so narrowly defined that they preclude consideration of reasonable alternatives for achieving the project’s underlying purpose. *North Coast Rivers Alliance v. Kawamura* (2015) 243 Cal.App.4th 647, 668. *See also County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 203 (EIR for expansion of groundwater extraction program failed to consider water conservation as alternative to increased groundwater extraction); *Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1302 (EIR for a proposal to supply water to expand a university campus was deficient because it failed to discuss a limited service alternative that could partially achieve project objectives).

The DEIR must be revised and recirculated with a legally adequate range of alternatives, including one or more “scaled back” versions of the Project that would, among other things, address the longstanding imbalance of widebody commercial and heavy cargo operations on the south airfield. *See Habitat & Watershed Caretakers*, 213 Cal.App.4th at 1302. For reasons discussed throughout these comments, the revised EIR should also analyze an alternative that delays construction of either or both of the proposed terminals until recovery from the global COVID-19 pandemic is fully underway and a fuller picture of the pandemic’s impact on the aviation sector is available.

**D. The Alternatives Analysis Relies on a Misleading No Project Alternative.**

The DEIR is fundamentally flawed in its characterization and analysis of the No Project Alternative. LAWA’s description and analysis of the No Project Alternative appears to have been carefully engineered to overstate the level of development and growth at LAX (and the associated impacts) that would occur with the absence of the Project. This approach fails to satisfy CEQA’s requirements of a no project analysis and amounts to a major legal flaw.

The purpose of a discussion of the No Project Alternative is to allow a comparison of the environmental impacts of approving the proposed Project with the effects of not approving it. CEQA Guidelines §15126.6(e)(1). The No Project Alternative must be a fact-based forecast of the environmental effects of maintaining the status quo. *Center for*

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*Biological Diversity v. Department of Fish & Wildlife* (2015) 234 Cal.App.4th 214, 253; *Planning & Conserv. League v. Castaic Lake Water Agency* (2009) 180 Cal.App.4th 210, 247. *See Planning & Conserv. League v. Department of Water Resources* (2000) 83 Cal.App.4th 892, 917 (no-project alternative is necessary to provide decision-makers and public with basic information they can use to measure environmental advantages and disadvantages of project). Moreover, the No Project Alternative's analysis of future conditions should describe any significant contingencies likely to affect its projections. *Id.* at 913.

Like the “gating analysis” and the Without Project scenario discussed in Part II.F, LAWA's No Project Alternative assumes the construction of 8 gates at MSC South, despite the fact that the MSC South Project has not been approved yet. DEIR at p. 5-15 (stating that under the No Project Alternative the MSC South would provide a “new 95,000-square-foot concourse” and “up to eight aircraft gates,” and associated airfield improvements). The No Project Alternative further errs by assuming that the current 18 WRGs will still be operating as a bus gate facility indefinitely. DEIR at p. 5-12 (stating that under the No Project Alternative “the existing 18 [WRGs] would not be removed/decommissioned and “[p]assengers would still be bused to and from the [WRGs] from the CTA.”). However, LAWA has repeatedly committed to decommissioning *all* of the WRGs once the MSC is built. Thus the No Project Alternative cannot assume the simultaneous operation of *both* the 23-gate MSC and the 18 WRGs, to make it look as though the airport without the Project could accommodate the same level of growth, and would have the same environmental impacts, as if the Project were approved.

By padding the No Project Alternative with at least 18 additional gates that would not actually exist in 2028 or after, LAWA violates CEQA's requirement to provide a fact-based forecast of the environmental effects of maintaining the status quo. *Center for Biological Diversity*, 234 Cal.App.4th at 253. Furthermore, for the numerous reasons explained in Part II, the DEIR lacks evidence for the statement that “the projected future passenger levels in 2028 under the No Project Alternative would be the same as for the proposed Project.” DEIR at p. 5-12.

Furthermore, even if the 18 WRGs and 23-gate MSC were to stay in the No Project Alternative, the DEIR still would fail to account for the reasonable possibility that the additional 12 passenger boarding gates that would allegedly occur with the Project (*see* DEIR, Appendix B.2, Table 2-1) could enable increased public health vigilance at terminals in a post-pandemic aviation sector, which would not be possible under the No Project Alternative. As explained earlier, LAWA's approach of assuming, without

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evidence, a complete return to 2019 conditions (i.e., a pre-pandemic aviation sector) by 2028 violates the CEQA requirement that the No Project Alternative describe any significant contingencies likely to affect its projections. *Id.* at 913. *Planning & Conserv. League*, 83 Cal.App.4th at 913.

In sum, LAWA must correct the deficiencies in the No Project Alternative as part of a revised and recirculated DEIR.

**V. The Environmental Impacts Analysis in Chapter 4 of the DEIR Is Deficient in Numerous Respects.**

For the numerous reasons explained in Part II of this letter, the DEIR's failure to acknowledge the Project's effect on LAX's operational capacity, and the associated environmental impacts, through 2045 results in a fundamentally flawed analysis for each impact area. By concluding that the Project would result in significant and unavoidable impacts in almost every impact area, while at the same time asserting that these significant/unavoidable impacts are *not really* due to the Project because they allegedly would happen anyway as a result of increased demand for air travel, LAWA thumbs its nose at CEQA's informational purpose. The DEIR's underlying strategy is to deflect a legal challenge while openly signaling to the decisionmakers that by approving the Project based on override findings, their hands would be clean of adverse environmental consequences. As explained, LAWA's strategy does not insulate it from a CEQA lawsuit because the DEIR conceals the true magnitude and duration of the Project's significant and unavoidable impacts by, among other things, cutting off the impact analysis at 2028.

**A. The DEIR's Approach to Mitigation Violates CEQA and Provides Inadequate Commitments to Enforceable Mitigation Measures.**

An EIR must identify feasible mitigation measures to reduce or avoid significant environmental impacts. CEQA Guidelines §15126.4. Under CEQA, "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects. . . ." Pub. Resources Code § 21002; *see also id.*, § 21081 (no agency "shall approve or carry out a project" that will cause significant effects unless it finds that all feasible mitigation measures or alternatives have been adopted).

Additionally, the primary goal of an EIR is to identify a project's significant environmental impacts and find ways to avoid or minimize them through the adoption of mitigation measures or project alternatives. *Id.*, §§ 21002.1(a), 21061. The lead agency

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must adopt all feasible mitigation measures that can substantially lessen the project's significant impacts, and it must ensure that these measures are enforceable. *Id.*, § 21002; CEQA Guidelines § 15002(a)(3), 15126.4(a)(2); *City of Marina v. Bd. of Trustees of the Cal. State Univ.* (2006) 39 Cal.4th 341, 359, 368-69. The requirement for enforceability ensures “that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded.” *Federation of Hillside and Canyon Assns. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (italics omitted); CEQA Guidelines § 15126.4(a)(2). The DEIR fails to comply with these requirements.

First, LAWA relies on previously approved mitigation measures that have yet to be implemented from the Master Plan. For example, LAWA has relied on a version of MM-AN (ATMP)-1 since adopting the 2004 LAX Master Plan, but has yet to complete this mitigation measure. LAWA cannot rely on this mitigation measure without an enforceable schedule and commitment to complete the Residential Sound Insulation (“RSI”) program, particularly in El Segundo. Without such a plan, the mitigation measures fails to be enforceable and specific enough for LAWA to rely on, especially in light of LAWA’s failed commitment to this mitigation measure since 2005.

Second, MM-AQ/GHG (ATMP)-2 is another example of recycled mitigation from previous projects that is not enforceable. In the Terminals 2 & 3 Modernization Project Mitigation Monitoring Reporting Program 2019 Annual Progress Report (June 2020), LAWA notes that a similar mitigation measure, MM-AQ (T2/T3)-1, requiring the use of renewable diesel fuel, showed no evidence of compliance in 2019. T2 & 3 MMRP 2019 Annual Progress Report at p. 8.<sup>39</sup> In that same report, LAWA assures that this requirement will be met in 2020, but does not provide any specific, enforceable measures to this effect for the Project.

The following sections discuss numerous additional, fatal errors with the mitigation measures LAWA proposes for the Project.

## **B. The DEIR’s Noise Impact Analyses Is Flawed.**

Because the DEIR takes the flawed position that the Project will not contribute at all toward higher passenger capacity or aircraft operations at LAX, the DEIR does not

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<sup>39</sup> Available at [https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/terminals-2-and-3/2019-t2-t3-mmrp-report\\_final](https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/terminals-2-and-3/2019-t2-t3-mmrp-report_final); last accessed Feb. 9, 2021.

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include any meaningful analysis of the Project's operational noise impacts. The exclusion of any significance determination or analysis regarding the Project's noise impact through 2045, and the individual and cumulative impacts on people at LAX and adjoining neighborhoods, is a fatal flaw. The DEIR must be revised to resolve this obvious deficiency under CEQA.

Furthermore, the DEIR's complete reliance on already-existing mitigation measures, which would fail to mitigate the Project's noise impacts, is not enough. Existing measures were not designed to mitigate noise from the passenger and operations levels that the Project will enable by 2045. Because LAWA has not justified its claim that the Project would not cause any impacts related to higher passenger levels or aircraft operations, the DEIR must be revised to include an analysis of the aviation noise impacts caused by the Project, and cumulative aviation noise impacts of other past, present or reasonably foreseeable future projects.

The DEIR's failure to provide real analysis of noise impacts from the Project's construction is another fatal flaw. Haul trucks, in particular, can be quite noisy. The revised DEIR must identify sensitive receptors along haul routes and evaluate how increases in noise from the Project's construction activities will impact these receptors. The revised analysis must also disclose the increase in noise levels from the cumulative increase in haul trucks from all of the other past, present and future projects identified in the DEIR.

**1. The Noise Generated by LAX Is of Utmost Concern to the Public and Deserves a Very Careful Analysis.**

Noise is one of the most obvious deleterious effects of LAX, yet the DEIR fails on several fronts to provide adequate information on this central issue. A considerable amount of study and research has been conducted to understand the effects of high noise levels on communities. For those who live near airports, noise from departing and arriving aircraft has been shown to be a constant source of distress, interfering with normal speech, interrupting sleep, and disrupting a wide range of activities. Studies also show that in addition to lifestyle disruption, there is a relationship between noise and the health of community residents, with high noise levels as a potential factor in hypertension, cardiovascular disorders, and gastrointestinal disturbances.

LAX poses an extraordinary noise burden on its neighbors. Residents, employees and students in the LAX environs suffer daily from the barrage of aircraft overflights. Residents living within the LAX air corridor have long complained about intrusive



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aircraft noises. Given the severity of the existing noise problem and the significant increase in aircraft operations that will result from the proposed Project, it is essential that the DEIR provide a complete and accurate picture of the Project's impacts on noise levels in the surrounding community. Instead, as detailed below, the DEIR's analysis of noise impacts is flawed in several respects, with the result that the public and decisionmakers cannot evaluate the severity or extent of the noise impact upon the affected communities. For example, the DEIR masks the Project's noise impacts by focusing on the Project's effect on average noise levels, rather than individual noise events. The DEIR also gives an incomplete picture of the aircraft noise impacts that would result during construction, while the airport's existing runways are relocated or reconstructed as part of the Project.

## **2. The DEIR Errs By Not Analyzing the Project's Noise Impacts Through 2045.**

The DEIR asserts there would be no long-term operational noise impacts in El Segundo associated with the Project. As explained earlier, however, the DEIR concludes that the Project's noise impacts are significant and unavoidable based on 2028 operations *whether or not* the Project is approved. The DEIR must instead disclose the *Project's* noise impact through 2045. This analysis must take into account individual and cumulative single-event noise impacts. Failing to do this violates CEQA.

Aviation forecasts and associated project/plan impacts are regularly evaluated in a way that looks out 20 years or more. Acoustical engineer Fred Svinth registers "surpris[e] that the future analysis study year [2028] is only 10 years from the baseline year, whereas many large projects include study years which are 20 years in the future so as to avoid a future year too close to the current year once the project is implemented." Svinth Report at p. 3. The Svinth Report points to the Noise Assessment for the Norman Y. Mineta San Jose International Airport Master Plan EIR (2019),<sup>40</sup> which used a 20-year timeframe to analyze the future noise environment due to forecasted aircraft operational levels. 2019 SJC Airport Master Plan Amendment EIR, Appendix J - Noise at p. 18.<sup>41</sup> The Svinth Report also notes its author's frequent involvement with other major infrastructure projects that have analyzed noise impacts 20 or more years into the future, including at

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<sup>40</sup> Available at <https://www.sanjoseca.gov/your-government/department-directory/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/sjc-airport-master-plan-update>; last accessed on Feb. 9, 2021.

<sup>41</sup> Available at <https://www.sanjoseca.gov/Home/ShowDocument?id=61662>; last accessed Feb. 9, 2021.

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the Port of Los Angeles. Svinth Report at p. 3.

LAWA has provided detailed forecasts of anticipated passenger and aircraft operations until 2045, 17 years beyond the aspirational buildout year and 26 years beyond the DEIR's baseline year (2018). DEIR, Appendices B.1 and B.2. Because LAWA *has* this forecast data, there is no justification for concluding that noise impacts in 2028 would be significant and unavoidable based on forecasted future operations through 2045, while failing to make significance conclusions for impacts beyond 2028. As the Svinth Report states, "Considering that planning projections have been completed to [2045], it seems reasonable to also analyze aircraft noise in the surrounding communities to 2045 or at least to 20 years beyond the project baseline year (2038)." Svinth Report at p. 3. *See also* Kanafani Report at p. 2 ("The DEIR fails to assess the effect of the improvements on traffic growth and on the resulting environmental impact of this growth.").

In sum, carrying the noise analysis out at least 20 years is necessary to provide a complete disclosure of noise impacts and is mandatory under CEQA. *See Cleveland National Forest Foundation*, 3 Cal.5th at 518. Despite possessing the background data needed to evaluate these noise impacts, LAWA fails to do so.

### **3. The DEIR Substantially Understates the Noise Impact of the Project Because It Evaluates Project Impacts Against an Inappropriate Baseline.**

CEQA requires lead agencies to "employ a realistic baseline that will give the public and decision makers the most accurate picture practically possible of the project's likely impacts." *Neighbors for Smart Rail*, 57 Cal.4th at 449. Moreover, the baseline may not be "misleading or without informational value." *Id.* at 457. The DEIR uses a 2018 baseline for the noise analysis and declines even to consider whether employing this baseline despite a nearly 75% decline in operations since 2019 would mislead or "give the public and decision makers the most accurate picture practically possible." *Id.* at 449. Unsupported statements in the Preamble to the DEIR, which cites anecdotally to previous recoveries from other "disruptive events" are not substantial evidence supporting LAWA's use of a 2018 baseline.

Contrary to LAWA's claims, any assumption that operations will have returned to "business as usual" once the Project is completed, rather than emerged permanently altered after the present transitional period, is pure speculation. *See* Kanafani Report at p. 1 (stating that current changes "in work habits, commerce and social activities may

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become long lasting if not permanent.”). If, for example, in a post-recovery aviation industry, more passenger boarding gates enable increased public health vigilance at terminals, then the growth and associated noise impact of adding up to 29 new passenger gates as part of this Project must be analyzed against a noise baseline of passenger/operational capacity *without* the public-health benefit of 29 additional gates. LAWA’s approach of assuming, without evidence, a return to 2019 conditions once the Project is completed would conceal this highly plausible effect of the Project on existing noise impacts.

Moreover, for the reasons explained in Part II, the “Without Project” scenario, purportedly provided for the “informational” purpose of claiming that operational noise impacts would be effectively the same in 2028, is likewise erroneous and causes the DEIR to understate the Project’s true noise impacts. LAWA must revise the “Without Project” scenario to omit the MSC South Project and the 18 WRGs, and reevaluate whether environmental impacts are actually different under each scenario.

**4. By Relying on CNEL to Evaluate Noise Impacts, the DEIR Fails to Adequately Analyze the Full Extent of the Project’s Noise Impacts.**

CEQA requires an EIR to “identify and focus on the significant environmental effects of the proposed project.” CEQA Guidelines § 15126.2(a). An EIR must contain “a sufficient degree of analysis to provide decisionmakers with information which enables them to make a decision which intelligently takes account of environmental consequences.” *Id.* § 15151. While an EIR need not be perfect, courts have insisted upon “adequacy, completeness, and a good faith effort at full disclosure.” *Id.* The level of detail required in addressing particular impacts should be “in proportion to their severity and probability of occurrence.” *Id.* § 15143.

The DEIR severely understates the Project’s noise impacts by relying on a noise level indicator that evaluates *average* noise levels. This noise indicator, referred to as Community Noise Equivalent Level or “CNEL,” averages noise events over a 24-hour period. Although CNEL provides one way to measure noise, when it is used as the *only* measure of noise, CNEL does not provide a true or complete picture of what individuals will actually hear as a result of the Project. People hear individual noise events; they do not hear noise averaged over a twenty four-hour period. All aspects of single-event noise impacts from the Project must therefore be analyzed here. This includes Sound Exposure Level (“SEL”) analysis noise impacts caused by Project-related changes to aircraft taxiing (routes, frequency/number, fleet mix), Project-related changes to aircraft flight

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operations (frequency/number, fleet mix), and Project-related changes to aircraft maintenance operations (frequency/number, fleet mix, location).<sup>42</sup>

The FAA has established a CNEL of less than 65 dBA as being “normally acceptable” with residential land uses, despite research and public testimony that a CNEL threshold of 65 dBA is not sufficient to protect the public’s health and welfare. *See, e.g.*, Jiao, Boshen et al. “The Cost-Effectiveness of Lowering Permissible Noise Levels Around U.S. Airports.” International Journal of Environmental Research and Public Health, vol. 14, December 2, 2017. <sup>43</sup> However, “[i]ntermittent and impulsive noises, such as aircraft overflights, have been found to be more disturbing to sleep than continuous noise sources.” Svinth Report at p. 2. Thus, people exposed to a CNEL of lower than 65 dBA may be significantly disturbed by aircraft noise, sometimes for many hours a day. Further, relative changes in single-event noise levels have been found to be predictive of sleep disturbance in residents of neighboring airports. *Id.* (citing Fidell S., Tabachnick B., Mestre V., and Fidell L. “Aircraft noise-induced awakenings are more reasonably predicted from relative than from absolute sound exposure levels,” *The Journal of the Acoustical Society of America* 134, 3645 (2013)). Yet, these people, particularly those who would be newly exposed to aircraft noise due to future Project-related operations or temporary construction-related aircraft noise increases, are ignored in the DEIR’s analysis of aircraft noise because noise levels in their communities (at least according to the DEIR) fall below a CNEL of 65 dBA. Svinth Report at p. 2.

The DEIR pays lip service to assessing the health effects of aircraft noise. The document contains perfunctory sections on speech communication, sleep disturbance, learning effects, and work performance effects. But rather than attempt to undertake a serious analysis of these physiological and psychological health effects resulting from the proposed Project, it merely states that there is little reliable evidence on the relationship between noise exposure and mental health. *See* Svinth Report at p. 1. Contrary to the

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<sup>42</sup> Moreover, as the Svinth Report explains, the CNEL analysis in the DEIR assumes a typical outdoor ambient noise level of 85 dBA CNEL for development adjacent to major freeways. This ambient level is overstated. Svinth Report at p. 1. In the author’s expert experience, ambient noise levels of 75-80 dBA are typical for the first row of development outside a freeway right-of-way. *Id.* (citing references). Overstating typical levels may result in noisy Project operations being interpreted as “background” noise, thereby understating the relative impact of Project noise on surrounding uses.

<sup>43</sup> Available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5750915/>; last accessed Mar. 9, 2021.

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assertion in the DEIR, ample studies and reports exist documenting the health impact of aircraft noise. Svinth Report at fn. 3; *see also* Basner, Mathias et al., “Aviation Noise Impacts: State of the Science.” *Noise & Health* vol. 19, Mar.-Apr. 2017.<sup>44</sup> LAWA must analyze and disclose the impacts that individuals living beneath the LAX flight paths will endure once the Project is implemented. Such an analysis must focus on the SEL noise levels, which are unrelenting and extraordinarily disruptive.

In *Berkeley Keep Jets Over the Bay Committee v. Board of Port Commissioners*, the court held that a lead agency “cannot simply ignore the CEQA standard of significance for assessing noise [and] the credible expert opinion calling for further evaluation of the impact of single event noise.” (2001) 91 Cal.App.4th 1344, 1382. Despite this, the DEIR impermissibly disregards the sensitivity of the community most affected by the Project’s noise impacts. *See Berkeley Keep Jets Over the Bay Com.*, 91 Cal.App.4th at 1380-81 (recognizing “significance of an activity may vary with the setting” as basis for CEQA’s site-sensitive threshold of senescence for noise); *King & Gardiner Farms, LLC v. Cty. of Kern* (2020) 45 Cal.App.5th 814, 894, as modified on denial of reh’g (Mar. 20, 2020) (holding that the agency failed to consider the magnitude of the increase in noise, and thus to “accurately describe[] how changes in noise levels affect human beings.”). A description of how noise affects a community without meaningful quantitative and qualitative analysis of “the community reaction to aircraft noise, including sleep disturbance” renders an EIR inadequate. *Berkeley Keep Jets Over the Bay Com.*, 91 Cal.App.4th at 1380-81. The court in *Berkeley Keep Jets Over the Bay Committee* expressly referred to single-event noise analysis as an appropriate method for measuring disturbance. *Id.* Thus, the DEIR must be revised to adequately measure sleep and speech communication disturbances and to disclose the full impact, including health impacts, of single-event disturbances.<sup>45</sup>

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<sup>44</sup> Available at <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5437751/>; last accessed Mar. 9, 2021.

<sup>45</sup> The Svinth Report notes that “the modeling software used in the noise analysis . . . has the ability to create a grid analysis graphic of changes in event based (Lmax) aircraft noise levels at residential and other noise sensitive uses in the airport vicinity. The inclusion of such a graphic and event-based noise data in combination with information provided on awakenings, sleep disturbance, and physiological effect of aircraft noise would allow the surrounding communities to be more fully informed as to the potential effects and impacts of aircraft noise.” Svinth Report at p. 3. Based on the availability of (footnote continued on next page)

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**5. The DEIR’s Omission of Single-Event Noise Impact Findings Is Anomalous Among EIRs for Comparable Airport Expansion Projects.**

We and El Segundo’s expert noise consultant have surveyed CEQA documents prepared for recent development proposals at other California airports. While we cannot say that those documents were fully compliant with CEQA, we did find that several were much more transparent and complete than the ATMP DEIR in a number of critical ways. Our survey of recent airport EIRs shows that single-event noise analysis is now the industry standard.

For example, the Noise Analysis for the 2016 Burbank Airport Replacement Passenger Terminal Project EIR contains SEL contours and SEL data tables to compare the SEL values for the noisiest passenger aircraft at the airport at selected noise-sensitive receptors. *See* 2016 Burbank Project EIR, Appendix K – Noise Technical Report at Table K-3 and Figures K-5 through K-12.<sup>46</sup> The document notes that aircraft SEL data is valuable for “demonstrat[ing] the spatial extent of noise events” resulting from, for example, aircraft taxiing operations for various project alternatives. *See id.* at p. K-9. Notably, the Burbank Airport project involved a 1-to-1 replacement of gates and would add no additional gates, unlike the Project, which would add up to 29 new gates.

2016 Burbank Project EIR, Appendix K – Noise Technical Report, Table K-3:

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this feature with the software the DEIR already relies on, the revised EIR should include this information.

<sup>46</sup> Available at <https://elevatebur.com/documents/>; last accessed on Feb. 9, 2021.

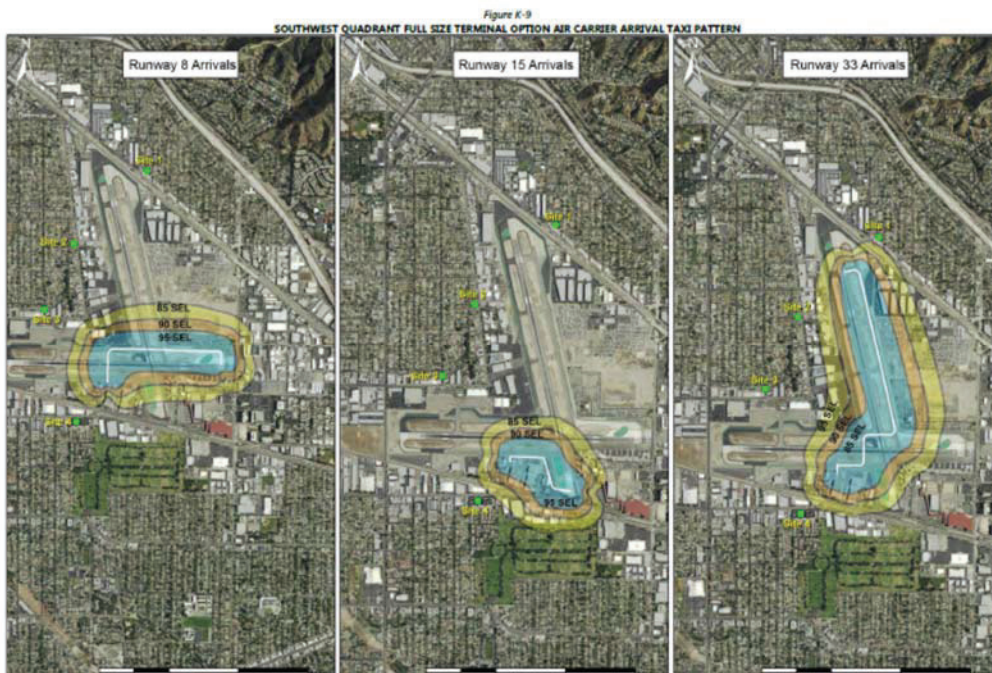
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Table K-3  
 737-800 Aircraft Taxi Noise (SEL) at Nearby Noise Sensitive Uses<sup>5</sup>

| Site ID and Taxi Path | Existing |        | Adjacent Property Full-Size Terminal Option |        | Southwest Quadrant Full-Size Terminal Option |        | Southwest Quadrant Same-Size Terminal Option |        |
|-----------------------|----------|--------|---|--------|--|--------|--|--------|
|                       | Arrival  | Depart | Arrival                                     | Depart | Arrival                                      | Depart | Arrival                                      | Depart |
| <b>Site 1</b>         |          |        |   |        |  |        |  |        |
| Runway 8              | 62.6     | -      | 64.6  | -      | 67   | -      | 67   | -      |
| Runway 33             | 83.8     | 66.5   | 82.9  | 65.4   | 82.3   | 86.9   | 82.3   | 86.9   |
| Runway 26             | -        | 65.6   | -   | 65.6   | -  | 62.5   | -  | 62.5   |
| Runway 15             | 58.3     | 82.9   | 63.4  | 82.9   | 86.9   | 82.5   | 86.9   | 82.5   |
| <b>Site 2</b>         |          |        |   |        |  |        |  |        |
| Runway 8              | 65.8     | -      | 70.6  | -      | 73   | -      | 73   | -      |
| Runway 33             | 80.7     | 72.1   | 80.4  | 71.8   | 81.1   | 82.2   | 81.1   | 82.2   |
| Runway 26             | -        | 71.5   | -   | 71.5   | -  | 66.7   | -  | 66.7   |
| Runway 15             | 63.1     | 80.4   | 70.4  | 80.4   | 82.2   | 81.5   | 82.2   | 81.5   |
| <b>Site 3</b>         |          |        |   |        |  |        |  |        |
| Runway 8              | 66       | -      | 70.9  | -      | 83.7   | -      | 83.7   | -      |
| Runway 33             | 74.2     | 71.4   | 71.3  | 73.9   | 75.8   | 70.8   | 75.8   | 70.8   |
| Runway 26             | -        | 70.3   | -   | 70.3   | -  | 71     | -  | 71     |
| Runway 15             | 66.9     | 71.3   | 70.7  | 71.3   | 70.8   | 84.2   | 70.8   | 84.2   |
| <b>Site 4</b>         |          |        |   |        |  |        |  |        |
| Runway 8              | 70.5     | -      | 72.8  | -      | 87.3   | -      | 87.3   | -      |
| Runway 33             | 72.1     | 73.7   | 65.2  | 80.1   | 81.1   | 61     | 81.1   | 61     |
| Runway 26             | -        | 71     | -   | 71     | -  | 81.7   | -  | 81.7   |
| Runway 15             | 76.2     | 65.2   | 73.8  | 65.2   | 61   | 87.3   | 61   | 87.3   |

Source: RSS&H, 2016

2016 Burbank Project EIR, Appendix K – Noise Technical Report, Fig. K-9:



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Similarly, the Noise Assessment for the Norman Y. Mineta San Jose International Airport Master Plan EIR (2019) presents Time Above (“TA”) values for aircraft noise levels greater than 75 dB and 85 dB at various receiver points, along with the overall land area exposed to the SEL values for the departure and arrival of various aircraft types, and SEL results for the predominant aircraft in the fleet mix. 2019 SJC Airport Master Plan Amendment EIR, Appendix J - Noise at Table 12, Table 13 and Table 14. The EIR also notes that an earlier (2003) EIR contained a similar analysis comparing existing and future SEL conditions and identified increases in SEL values in the airport vicinity. *Id.* at p. 25.

2019 SJC Airport Master Plan Amendment EIR, Appendix J – Noise, Table 12:

**Table 12 – Time Above (TA) 75 dBA and 85 dBA for All Scenarios (in minutes)**

| Reference Grid Points | Location Street  | Location City   | Time Above 75dB in Minutes |         |            | Time Above 85dB in Minutes |         |            |
|-----------------------|--|-----------------|----------------------------|---------|------------|----------------------------|---------|------------|
|                       |  |                 | Baseline                   | Project | No Project | Baseline                   | Project | No Project |
| 1                     | RMS 10 - Residential   | Santa Clara, CA | 12.0                       | 14.4    | 14.5       | 0.1                        | 0.1     | 0.1        |
| 2                     | Public Utility (adjacent residential)                            | Santa Clara, CA | 3.5                        | 4.6     | 4.6        | 0.0                        | 0.0     | 0.0        |
| 3                     | Agnew Park - SW cr. Agnew Rd. / Cheerney St.                     | Santa Clara, CA | 8.7                        | 11.7    | 11.8       | 0.1                        | 0.1     | 0.1        |
| 4                     | Convalescent Hospital - N. Side Clyde Ave. @ Loch Lomond St.     | Santa Clara, CA | 13.3                       | 14.6    | 14.6       | 0.1                        | 0.1     | 0.1        |
| 5                     | Center for Performing Arts                                       | San Jose, CA    | 22.4                       | 30.5    | 30.5       | 0.0                        | 0.0     | 0.0        |
| 6                     | Montague Park/School   | Santa Clara, CA | 14.8                       | 17.6    | 17.6       | 0.0                        | 0.0     | 0.0        |
| 7                     | Chestnut St.   | Santa Clara, CA | 1.3                        | 1.8     | 1.8        | 0.0                        | 0.0     | 0.0        |
| 8                     | Fairway Glen Park/Hughes School                                  | Santa Clara, CA | 0.4                        | 0.4     | 0.4        | 0.0                        | 0.0     | 0.0        |
| 9                     | Washington School  | San Jose, CA    | 14.1                       | 18.7    | 18.7       | 0.0                        | 0.0     | 0.0        |
| 10                    | Bellarmine Prep School   | San Jose, CA    | 0.2                        | 0.3     | 0.3        | 0.0                        | 0.0     | 0.0        |
| 11                    | Residential  | San Jose, CA    | 23.8                       | 21.6    | 21.5       | 0.1                        | 0.5     | 0.5        |
| 12                    | Alviso Community Center - SE cr. San Jose Alviso Rd./Liberty St. | San Jose, CA    | 0.2                        | 0.1     | 0.1        | 0.0                        | 0.0     | 0.0        |
| 13                    | Cottage Trailer Grove - SW cr. Monterey Hwy./San Jose Ave.       | San Jose, CA    | 2.7                        | 3.0     | 3.0        | 0.0                        | 0.0     | 0.0        |
| 14                    | Agnews State Hospital - SW cr. Lick Mill Rd./Lick Mill Blvd.     | Santa Clara, CA | 0.1                        | 0.1     | 0.1        | 0.0                        | 0.0     | 0.0        |
| 15                    | Bachrodt School - SE cr. Sonora Ave./Forrestal Ave.              | San Jose, CA    | 0.7                        | 0.8     | 0.8        | 0.0                        | 0.0     | 0.0        |
| 16                    | Hester School - SE cr. Alameda/Pershing Ave.                     | San Jose, CA    | 0.1                        | 0.0     | 0.0        | 0.0                        | 0.0     | 0.0        |
| 17                    | Ryland Park - SW cr. N. First St./Fox Ave.                       | San Jose, CA    | 0.8                        | 0.8     | 0.8        | 0.0                        | 0.0     | 0.0        |
| 18                    | Lampighter Trailer Park - Sw of Hwy 237 and N. First St.         | San Jose, CA    | 0.1                        | 0.0     | 0.0        | 0.0                        | 0.0     | 0.0        |

Source: AEDT version 2d and BridgeNet International, 2019



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2019 SJC Airport Master Plan Amendment EIR, Appendix J – Noise, Table 13:

**Table 13 – Sound Exposure Level in Acres**

| Arrivals<br>AEDT Type | SEL dBA Area in Acres |         |        |        |        |       |       |     |
|-----------------------|-----------------------|---------|--------|--------|--------|-------|-------|-----|
|                       | 55                    | 60      | 65     | 70     | 75     | 80    | 85    | 90  |
| A319-131              | 73,526                | 49,723  | 30,018 | 14,404 | 5,311  | 2,357 | 718   | 204 |
| A320-211              | 87,915                | 60,293  | 38,675 | 19,987 | 7,429  | 2,875 | 913   | 269 |
| 737700                | 73,780                | 51,305  | 31,580 | 16,669 | 8,094  | 3,499 | 1,362 | 415 |
| 737800                | 93,976                | 64,126  | 39,599 | 21,138 | 9,252  | 4,695 | 1,473 | 406 |
| 7378MAX               | 174,321               | 118,790 | 78,087 | 45,420 | 22,402 | 4,475 | 1,282 | 354 |
| EMB175                | 55,634                | 37,137  | 21,031 | 10,332 | 4,699  | 2,175 | 802   | 203 |
| CL600                 | 23,021                | 11,590  | 5,576  | 2,768  | 1,285  | 509   | 156   | 41  |
| CNA750                | 44,486                | 26,813  | 13,045 | 6,147  | 2,583  | 962   | 318   | 111 |

| Departures<br>AEDT Type | SEL dBA Area in Acres |         |        |        |        |       |       |       |
|-------------------------|-----------------------|---------|--------|--------|--------|-------|-------|-------|
|                         | 55                    | 60      | 65     | 70     | 75     | 80    | 85    | 90    |
| A319-131                | 99,036                | 66,711  | 43,014 | 24,653 | 10,913 | 4,190 | 1,733 | 752   |
| A320-211                | 123,021               | 82,972  | 53,975 | 31,719 | 13,919 | 5,639 | 2,224 | 1,057 |
| 737700                  | 137,667               | 93,838  | 63,336 | 40,538 | 22,209 | 8,238 | 2,890 | 982   |
| 737800                  | 165,198               | 111,320 | 74,816 | 47,957 | 26,648 | 9,989 | 3,650 | 1,605 |
| 7378MAX                 | 121,346               | 75,489  | 44,387 | 19,464 | 7,889  | 2,969 | 1,245 | 421   |
| EMB175                  | 119,372               | 80,689  | 52,755 | 31,165 | 13,780 | 5,461 | 1,942 | 705   |
| CL600                   | 74,648                | 49,482  | 29,943 | 13,404 | 5,548  | 2,301 | 1,061 | 373   |
| CNA750                  | 55,461                | 28,770  | 12,386 | 5,471  | 2,264  | 890   | 355   | 140   |

Source: AEDT version 2d and BridgeNet International, 2019

2019 SJC Airport Master Plan Amendment EIR, Appendix J – Noise, Table 14:

**Table 14 – Single Event Aircraft Sound Levels for All Scenarios (SEL in dB)**

| Reference Grid Points | Location Street  | Location City   | Airbus A319 | Boeing B737 | Boeing B38M | Embraer E175 |
|-----------------------|--|-----------------|-------------|-------------|-------------|--------------|
| 1                     | RMS 10 - Residential   | Santa Clara, CA | 88.5        | 89.1        | 86.7        | 87.4         |
| 2                     | Public Utility (adjacent residential)                            | Santa Clara, CA | 83.6        | 86.7        | 82.7        | 84.9         |
| 3                     | Agnew Park - SW cr. Agnew Rd. / Cheeney St.                      | Santa Clara, CA | 87.5        | 88.5        | 86.1        | 86.8         |
| 4                     | Convalescent Hospital - N. Side Clyde Ave. @ Loch Lomond St.     | Santa Clara, CA | 88.5        | 87.6        | 86.5        | 87.7         |
| 5                     | Center for Performing Arts                                       | San Jose, CA    | 89.0        | 91.3        | 90.7        | 88.7         |
| 6                     | Montague Park/School   | Santa Clara, CA | 87.8        | 86.8        | 85.5        | 87.1         |
| 7                     | Chestnut St.   | Santa Clara, CA | 82.2        | 84.2        | 80.6        | 83.6         |
| 8                     | Fairway Glen Park/Hughes School                                  | Santa Clara, CA | 80.5        | 83.8        | 79.1        | 82.8         |
| 9                     | Washington School  | San Jose, CA    | 87.1        | 89.5        | 88.7        | 87.0         |
| 10                    | Bellarmine Prep School   | San Jose, CA    | 69.1        | 72.6        | 71.7        | 70.0         |
| 11                    | Residential  | San Jose, CA    | 75.3        | 80.2        | 74.6        | 78.9         |
| 12                    | Alviso Community Center - SE cr. San Jose Alviso Rd./Liberty St. | San Jose, CA    | 72.9        | 77.3        | 71.2        | 75.8         |
| 13                    | Cottage Trailer Grove - SW cr. Monterey Hwy./San Jose Ave.       | San Jose, CA    | 84.9        | 87.2        | 86.7        | 85.1         |
| 14                    | Agnews State Hospital - SW cr. Lick Mill Rd./Lick Mill Blvd.     | Santa Clara, CA | 78.5        | 81.5        | 76.7        | 80.5         |
| 15                    | Bachrodt School - SE cr. Sonora Ave./Forrestal Ave.              | San Jose, CA    | 77.1        | 80.1        | 76.3        | 80.4         |
| 16                    | Hester School - SE cr. Alameda/Pershing Ave.                     | San Jose, CA    | 68.2        | 71.8        | 70.9        | 69.2         |
| 17                    | Ryland Park - SW cr. N. First St./Fox Ave.                       | San Jose, CA    | 72.3        | 75.7        | 74.9        | 73.1         |
| 18                    | Lamplighter Trailer Park - Swvof Hwy 237 and N. First St.        | San Jose, CA    | 73.0        | 78.1        | 71.2        | 76.4         |

Source: AEDT version 2d and BridgeNet International, 2019

Single event analysis of noise is feasible and does not require speculation. El Segundo’s expert noise consultant opines that the DEIR’s aircraft noise analysis “should at least provide event-based noise data such as maximum noise levels, single event levels, and/or time above information for existing and future aircraft operations at residential and other noise sensitive uses in the airport vicinity.” Svinth Report at p. 3. LAWA has deviated from the norm here by not providing this analysis.

**6. The DEIR Inadequately Discloses, and Fails to Mitigate, Noise Impacts on El Segundo Residents Due to Airfield Construction.**

The DEIR attributes one narrow noise impact to the Project, namely, a significant and unavoidable increase in runway operations noise exceeding 65 dBA CNEL, and/or an increase in noise or exceeding 1.5 dBA CNEL in areas already exposed to 65 dBA CNEL or higher. DEIR at p. 4.7.1-40. The increase would be due to a temporary (estimated at 4.5-month) shift of runway operations from the north airfield to the south airfield, while the north airfield taxiway/runway exit improvements are being implemented. The DEIR states that the temporary impact would occur toward the southwest corner of the airport, and affect residents in the northwest corner of El Segundo.

However, the DEIR fails to provide enough information to make this disclosure meaningful, or sufficient, under CEQA. First, the DEIR does not even attempt to identify

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which areas, including which residences, would be affected by the temporary increase in noise. Svint Report at p. 4 (“DEIR discusses the effect of the temporary runway closures on residential areas [but] does not specifically define these areas”). The question of which residences or other land uses would be impacted by this aspect of the Project depends on the anticipated noise baseline in 2023 and 2024, when the runway shift would occur; other than stating that this temporary impact is measured against the 2023/2024 baseline, however, the DEIR does not actually state what this baseline *is* (e.g., does not provide a noise contour). See DEIR at p. 4.7.1-31. Nor does the DEIR state what facilities or operational assumption existing in 2023/2024 would be factored into this baseline. *Id.* The affected area/residences, number of noise-sensitive uses exposed, the level of noise impact at these uses and the 2023/2024 baseline used to make these determinations must be disclosed in the revised EIR.

Second, as stated earlier, the full disclosure of impacts from the temporary shift in runway operations to the south airfield must include single-event noise data. *Id.* (data should be presented as “existing and future maximum noise levels, single event levels, and/or time above information for aircraft operations at residential and other noise sensitive uses in the airport vicinity”). See *Berkeley Keep Jets Over the Bay Com.*, 91 Cal.App.4th at 1382; *King & Gardiner Farms, LLC*, 45 Cal.App.5th at 894.

Third, the DEIR does not even attempt to mitigate this temporary-but-significant impact, instead asserting that relief from a temporary increase in runway aircraft noise would not be feasible. This conclusion is not supported by substantial evidence; for instance, temporary treatments such as noise barrier blankets, or relocating some or all affected residents for the duration of construction, may both be feasible mitigation measures. Yet the DEIR fails even to consider either of these options, or any others. Because the DEIR fails to quantify the actual noise exposure during the runway closure period (and thus the amount of noise that would have to be mitigated in order to reduce the impact to less-than-significant), or the number/location of noise sensitive uses that would be impacted, the DEIR’s determination of infeasibility is without basis.

#### **7. The DEIR Fails to Adequately Analyze or Mitigate Construction Staging/Hauling Noise Impacts.**

The DEIR also fails to adequately analyze and mitigate construction noise impacts. First, the DEIR’s identification of existing ambient conditions against which construction noise is measured are not based on substantial evidence. Second, because the analysis once again relies on CNEL data, it masks actual construction noise impacts, which would be more appropriately assessed using hourly noise levels or another metric.

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As the Svinth Report notes, the ambient conditions used to evaluate construction noise only take into account aircraft noise, and omit other ambient noise sources such as roadway traffic, commercial activities and other land uses/activities which could contribute to ambient noise levels. Svinth Report at p. 5. Furthermore, noise measurement data should have been recorded at times of day corresponding with likely construction activities in order to establish existing ambient noise levels. *Id.*

Moreover, as the Svinth Report explains, whereas most projects evaluate construction noise using peak hourly average (Leq) or maximum (Lmax) noise levels, here the DEIR reports construction impacts using a daily CNEL level by hour. Yet LAWA appears to have done—and opted not to disclose—the hourly Leq levels for each construction phase. Svinth Report at p. 6. The DEIR must disclose the analysis of construction noise impacts in a more meaningful metric, such as peak hourly average or maximum noise levels, and compare this data to the properly measured ambient conditions at each identified sensitive receptor during daytime, evening, nighttime and early morning hours. *Id.*

It also does not appear that noise measurements were taken to the south of the airport—in contrast to numerous measurements taken at the north side—despite the fact that the Project includes major components on the south side of the airport, including Terminal 9, the proposed Taxiway C extension, potential construction staging (including concrete-mixing) at the Continental City site, and proposed truck hauling along Imperial Highway or other haul routes in or adjacent to El Segundo.

The DEIR identifies Imperial Highway and other routes in or adjacent to El Segundo as construction haul routes. DEIR at p. 2-82 (Figure 2-29). This diagram also identifies the Continental City site, adjacent to El Segundo, as a potential construction staging area. *Id.* Despite these potential detrimental impacts to El Segundo's sensitive noise receptors, LAWA has only placed one Construction Noise Analysis Receptor on the southside of the airport. *Id.* at p. 4.7.3-6 (Construction Staging Area Receptor S8 located in a residential south of airport land use setting.) Further, the diagram showing the receptors near construction does not even show this receptor on the south side of LAX. *Id.* at 4.7.3-3 (Figure 4.7.3-1). LAWA must include additional noise measurements and receptors from the south of the airport in order to evaluate whether these components' impacts would exceed the threshold of 5 dBA over ambient levels.

For the foregoing reasons, the finding that construction noise impacts would be mitigable with “Construction Noise Control Plans” is unsupported by substantial evidence. The DEIR fails to disclose the true nature or extent of these construction noise

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impacts. Thus, MM-CN (ATMP)-1—which furthermore, is based on the inadequate CNEL metric, rather than hourly similar metric—cannot be found to mitigate this significant noise impact to less-than-significant.

Furthermore, given the potential for significant noise impacts to El Segundo from construction staging at the Continental City site, LAWA should remove this staging location from the ATMP. Even removing the use of this site, LAWA must evaluate and quantify the increase in noise attributable to construction staging and identify all feasible mitigation to reduce these impacts.

#### **8. The DEIR Fails to Adequately Analyze or Mitigate Roadway Traffic Noise.**

The Svinth Report finds the DEIR’s analysis of roadway traffic noise deficient in multiple respects. First, the DEIR fails to adequately measure existing traffic noise because it is based solely on short-term traffic noise level measurements, rather than a combination of short-term measurements with long-term reference noise measurements. Long-term reference noise measurements are necessary to properly establish peak hour traffic noise levels. Svinth Report at p. 4.

Second, the DEIR uses a too-high threshold of significance to analyze traffic noise, effectively determining such noise impacts to be significant only if they more than double the background noise. To the contrary, as the Svinth Report explains, a peak hour Leq increase of 3 to 5 dBA is a proper threshold for traffic noise impacts. Use of this threshold, instead of the DEIR’s peak hour “L” increase of 12 dBA, would disclose more receptors than the DEIR currently discloses which would be subject to a significant increase in Project traffic noise. *Id.*

Third, as with aviation noise impacts, the Svinth Report opines that the future traffic analysis study year should be substantially further ahead than just 9 years from the baseline year. As noted earlier, many large projects use study years 20 years into the future to measure traffic noise. Svinth Report at p. 5. The failure to analyze traffic noise impacts further into the future casts doubt on the DEIR’s unsupported assertion that traffic growth (and thus, traffic noise impacts) would be the same with or without the Project.

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## 9. The DEIR Fails to Propose Adequate Mitigation to Address the Project's Significant and Unavoidable Noise Impacts.

Under CEQA, mitigation measures must be specific and enforceable. CEQA Guidelines § 15126.4(a)(3); *Oro Fino Gold Mining Corp. v. County of El Dorado* (1990) 225 Cal.App.3d 872, 884-85. LAWA fails to formulate and recommend specific and enforceable mitigation measures for the Project's significant noise impacts, with the result that the majority of the Project's noise impacts are determined to be significant and unavoidable. Moreover, as explained earlier, the DEIR fails even to disclose the full magnitude and duration of the significant and unavoidable impacts it states would occur.

The DEIR relies on the following mitigation measure (MM-AN (ATMP)-1) to address the noise impacts of aircraft operations at LAX on surrounding communities, including El Segundo:

- **MM-AN (ATMP)-1. Sound Insulation Programs.**

To mitigate significant impacts to noise-sensitive uses that are newly exposed to 65 dBA CNEL or greater from airport operations in future years of the proposed Project, LAWA will update the Noise Exposure Maps (NEM) for LAX in accordance with Title 14 CFR Part 150, prior to project completion. The NEM is the legal document required by FAA to identify noise-sensitive land uses potentially eligible for noise mitigation funding through the FAA's Airport Improvement Program. LAWA will complete the NEM Report and coordinate with FAA to identify any noise-sensitive land uses eligible for noise mitigation and, in accordance with FAA regulations and guidance, apply for noise mitigation funding for eligible noise-sensitive uses. LAWA will work with the appropriate jurisdiction(s) to determine/establish an appropriate implementation program for any eligible noise mitigation. Property owners' eligibility for noise mitigation will be based upon FAA requirements and the LAX Part 150 NEM in effect at the time of operation or completion of the Project.

This measure is similar to many prior mitigation measures promised by LAWA. For example the 2004 Master Plan included MM-LU1, which called for LAWA to update, expand, accelerate, and report on implementation of its Aircraft Noise Mitigation Program ("ANMP"), which includes RSI for residences around LAX consistent with state law. Likewise, the West Aircraft Maintenance Area Project included MM-N-1, which reconfirmed LAWA's obligation to implement its ANMP. Simply stated, LAWA has consistently pointed to its ANMP generally and RSI treatment specifically, to argue that LAX noise impacts to surrounding residents will be mitigated as required by CEQA. Unfortunately, although the areas that need RSI treatment have remained relatively constant, LAWA has not made any appreciable progress recently toward providing needed RSI in El Segundo. Simply put, although LAWA acknowledges its RSI obligations, it has failed to follow through on that promise of mitigation.

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LAWA's most recent (2019) progress report for the 2004 Master Plan MMRP<sup>47</sup> summarizes 2004 Master Plan included MM-LU1 and LAWA's progress toward implementation as follows: "The ANMP describes ongoing LAWA efforts to convert existing incompatible land uses surrounding LAX to compatible land uses through the implementation of two noise mitigation strategies: (1) sound insulation of structures; and (2) acquisition of property followed by the conversion of incompatible land use to compatible land use. The ANMP implementation reduces adverse noise impacts and achieves airport standards as set forth in Title 21 of the California Code of Regulations. LAWA also periodically submits ANMP reports to the State of California as a condition of LAWA's Variance as LAWA continues working to achieve land use compatibility.

"LAWA completed the soundproofing program for the City of Los Angeles in 2014 and continues to fund and oversee residential sound insulation programs implemented by the City of Inglewood and County of Los Angeles. LAWA also continues to convert incompatible land use to compatible land use through the Residential Acquisition Program."

The first thing to note about the 2019 progress report is that LAWA acknowledges it completed RSI for homes within the City of Los Angeles back in 2014, which indicates compliance with the mitigation measure is feasible when LAWA makes the necessary commitment of time, attention, and resources. When it came to RSI benefitting residents of Los Angeles, LAWA was apparently willing to make that commitment. Also noteworthy is the fact that LAWA provides no clear timeline or commitment of resources in the mitigation measure for the completion of RSI for homes outside the City of Los Angeles. It is difficult not to conclude from this that LAWA has prioritized Los Angeles residents over non-residents.

Additionally, the progress report makes no mention at all of El Segundo and does not acknowledge LAWA's obligation to implement RSI in El Segundo. The City of El Segundo ran the RSI program within its boundaries until it was suspended in 2016 and terminated in July of 2018. El Segundo handed the program over to LAWA at that time due to a number of concerns over changes mandated by LAWA and FAA. *See* Exhibit 16, October 18, 2018 Letter to LAWA re El Segundo RSI Program Termination; Exhibit 17, November 14, 2018 Letter to FAA re El Segundo RSI Program Termination. Since that hand-off LAWA has made no appreciable progress toward advancing RSI in El Segundo despite its clear legal obligations to do so. In fact, LAWA has repeatedly

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<sup>47</sup> Available at [https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/mmrp\\_2019.ashx](https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/mmrp_2019.ashx); last accessed Feb. 9, 2021.

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resisted and delayed doing RSI despite consistent requests and offers of cooperation by El Segundo. LAWA initially attempted to avoid responsibility, but now seems to accept that as the operator of LAX, it must proceed with RSI in El Segundo. Recently, LAWA has indicated that it may retain a consultant to run the RSI program in El Segundo, but has yet to even issue the RFP for those consultant services, which makes LAWA's timing for any consultant contract award unknown and uncertain. *See* Exhibit 18, September 18, 2020 Letter to LAWA re Compliance with Stipulated Variance; Exhibit 19, October 1, 2020 Letter from LAWA to El Segundo re Variance Compliance Plan; Exhibit 20, February 5, 2021 Letter to LAWA re Compliance with Stipulated Variance. Such delay and uncertainty are inconsistent with LAWA's obligations under prior CEQA mitigation measures.

LAWA's delay in implementing RSI in El Segundo is also inconsistent with the variance for LAX as issued by Caltrans under state law. The most recent (2020) variance is provided in Exhibit 21, 2020 LAX Stipulated Variance. It provides that LAWA must continue to implement and update its ANMP and "use its best efforts to complete the acoustic treatment portion of the total ANMP for all affected jurisdictions within nine years from the effective date of this decision." In order to meet this schedule and complete RSI by 2028-2029, LAWA should already have started an RSI program in El Segundo, but it has not yet made the necessary commitment of time, attention, and resources.

LAWA's ongoing failure to proceed with RSI in El Segundo is inconsistent with state law, the variance for LAX as issued by Caltrans, LAWA's obligations under existing CEQA mitigation measures, and the Noise Element of the City of Los Angeles' General Plan, Policy 1.1 of which requires that LAX's noise impact "be reduced to achieve zero incompatible uses within a CNEL of 65 dB airport noise exposure area," as required by Caltrans' regulations. LAWA's ongoing failure to act also undermines its reliance on MM-AN (ATMP)-1 in the DEIR. Simply stated, because LAWA is already out of compliance with similar measures adopted as part of prior projects and has not demonstrated the necessary commitment to proceed with RSI in El Segundo, it cannot reasonably rely on MM-AN (ATMP)-1 to mitigate the impacts of ATMP noise. To address this problem, MM-AN (ATMP)-1 must be revised to include clear and enforceable timelines and funding levels for completion of RSI. In the absence of such timelines and funding, the mitigation measure is ineffective and inadequate under CEQA.

As a step toward demonstrating a commitment to noise reduction in El Segundo,



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LAWA should partner with El Segundo on LAWA's existing Fly Quieter Program,<sup>48</sup> described as an existing local regulation in the DEIR. DEIR at p. 4.7.1-25. As part of this partnership, LAWA would provide El Segundo with regular updates on LAWA's progress on noise mitigation in El Segundo, and involve El Segundo in decisions regarding which airlines should receive positive recognition with respect to noise impacting El Segundo. That recognition may include a formal commendation from the City of El Segundo. Additionally, El Segundo requests that LAWA produce and publish on its website a quarterly "snapshot" report/map showing the current location, size and configuration for all passenger gates in existence at LAX. This inventory will include all aircraft gates (contact and remote) and will be comparable to DEIR, Appendix B.2, Exhibit 2-3. El Segundo also requests that LAWA continue to provide representatives of El Segundo with an opportunity to conduct an escorted physical gate count once per year. The gate count enables El Segundo to better understand the sources of the airport's noise impact on residents so that El Segundo can work with LAWA to address them.

**C. The DEIR Fails to Adequately Evaluate or Mitigate the Project's Transportation Impacts.**

**1. The DEIR Underestimates the Project's Transportation Impacts Because It Incorrectly Assumes the Project Would Not Increase Passenger Activity.**

The DEIR's transportation analysis attempts to obscure the fact that the Project will have any environmental impacts at all. As discussed above, the overarching flaw in the DEIR is that growth in aviation activity—and all the impacts associated with it—will occur with or without the Project; on this basis, the DEIR attempts to assure readers that many of the Project's effects would be essentially the same regardless of whether the Project is built. *See* DEIR at p. 4.8-58 (stating that passenger VMT would change slightly as a result of the Project and that "[t]his is due to an increase in the passenger activity at LAX by year 2028, when passenger levels are projected to increase to 110.8 million annual passengers (MAP) with or without implementation of the proposed Project."). In effect, the assumption is that the proposed Project is intended to accommodate passenger demand that will occur regardless of whether the Project is completed; passenger traffic will simply be redistributed within the airport and no off-site traffic impacts will be associated with those passengers. *See* DEIR at p. 4.8-39 (Table 4.8-7) showing that the only trips associated with the Project are 4,700 estimated employee trips from Concourse

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<sup>48</sup> Available at <https://www.lawa.org/lawa-environment/noise-management/lawa-noise-management-lax/lax-fly-quieter-program>; last accessed Feb. 9, 2021.

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0 and Terminal 9.

As discussed above, the Project would remove an existing constraint on growth. Once this constraint is removed, it is inevitable that there will be an increase in passenger activity with a corresponding increase in passenger trips.

**2. The DEIR Fails to Disclose the Project’s Transportation Impacts Because it Analyzes Impacts Against a Future (2028) Baseline and Does Not Evaluate Impacts Beyond 2028.**

The DEIR uses a projected future conditions baseline in the analysis of transportation impacts, stating that such an approach is appropriate because “substantial evidence in the record” demonstrates that certain transportation improvements contemplated by the LAMP are scheduled for completion in 2028 and that it would be misleading and without informative value to analyze the Project’s impacts without accounting for these improvements. DEIR at pp. 4-4, 4.8-32. The DEIR also suggests that using an Existing (2019) Conditions Baseline would be misleading as it would confound the ability to distinguish VMT changes in 2028 that are due to the proposed Project from the VMT changes in 2028 that are due to Phase 1 of the LAMP. DEIR at pp. 4.8-6, 4.8-32.

CEQA does allow a lead agency to rely on a future baseline under limited conditions. In *Neighbors for Smart Rail*, 57 Cal.4th 439, the California Supreme Court recognized that, under limited circumstances, a departure from existing conditions (i.e., NOP date) may be appropriate. But only when “justified by substantial evidence that an analysis based on existing conditions would tend to be misleading or without informational value to EIR users.” *Id.* at p. 445. Here, the DEIR does not provide evidentiary support that all of the Phase 1 LAMP transportation projects (APM, ITF East, ITF West, CONRAC) would be constructed and operational by 2028.<sup>49</sup> If these

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<sup>49</sup> The DEIR also asserts that Metro’s Crenshaw/LAX Line and the AMC 96th Street Transit Station will also be completed by 2028, including an interface between the station and the LAMP facilities. DEIR at pp. 4.8-33, 4.8-36. The DEIR lacks support for these assertions. Metro has reduced its budget substantially due to COVID-19, with cuts to new rail lines. See Laura J. Nelson, “L.A. Metro cuts budget by \$1.2 billion, locking in steep reduction to bus, rail service”, *Los Angeles Times*, Sept. 24, 2020 (available at <https://www.latimes.com/california/story/2020-09-24/metro-bus-train-service-cuts-coronavirus-pandemic-budget>; last accessed Feb. 9, 2021). The DEIR makes no mention (footnote continued on next page)

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improvements are not completed by 2028, it is misleading to rely on 2028 for purposes of evaluating the Project's transportation impacts. *See* DEIR at pp. 4.8-32, 4.8-33, explaining that the LAMP transportation improvements will substantially change the surface transportation characteristics around the airport, including VMT.<sup>50</sup>

The use of 2028 as the baseline for evaluating the Project's transportation impacts is even more problematic because the DEIR evaluates the Project's impacts only through 2028. By using 2028 as both the baseline for evaluating impacts and as the Project horizon, the DEIR ignores any impacts from the Project that would occur after 2028. This approach makes no sense. The Airport will continue to operate—and the Project's effect on surface transportation will continue—well beyond 2028. Passenger demand at LAX is projected to increase to 110.8 MAP in fiscal year 2028 compared to 86.1 MAP in fiscal year 2018, almost a 30 percent increase. DEIR at p. 2-17. Passenger activity in the year 2045 is projected to be 127.9 MAP, which represents roughly a 50 percent increase over existing conditions and a 15 percent increase over the 2028 Baseline. By terminating the analysis of the Project's transportation impacts at the year 2028, the DEIR fails to address the effects of this substantial increase in activity at LAX, some of which would certainly be caused by the Project's improvements. This approach deprives the public and decisionmakers of information necessary to a full understanding of the Project's impacts, and divests the DEIR's significance conclusions of evidentiary support. Where, as here, a project will have a long-lasting effect on travel patterns, the lead agency must make a good-faith effort to disclose and analyze the significance of the Project's transportation impacts. *Cleveland National Forest Foundation*, 3 Cal.5th at 513.

The DEIR should be revised to include an assessment of VMT using two baselines: (1) 2020 (without the LAMP improvements, Metro's public transit improvements and the unidentified roadway projects assumed in the SCAG 2016-2040 RTP/SCS, and which accounts for COVID-19), and (2) 2028 (with all of these roadway

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of whether these transit projects are still on schedule to be completed by 2028. The DEIR also states that certain regional roadway improvements included in SCAG's 2016-2040 RTP/SCS were included in the Future Conditions baseline (2028) model (DEIR at p. 4.8-35); however, the document does not identify these projects.

<sup>50</sup> As explained at the beginning of these comments, per the 2017 settlement, El Segundo has not challenged, and would not challenge LAWA's implementation of LAMP as originally approved and as clearly described in the 2017 settlement agreement. The 2017 settlement does not, however, preclude El Segundo from challenging the changes to LAMP that LAWA is now proposing as part of the ATMP.

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and transit projects, assuming the DEIR has evidentiary support that these projects will in fact be operational by 2028). This first baseline approach would allow decisionmakers and the public to evaluate how the Project would affect the transportation network, including VMT, based on conditions as they exist today.

### **3. The DEIR Relies on Questionable Trip Generation Estimates.**

The DEIR identifies trip generation rates associated with the ATMP, but only for the new employees in Concourse 0 and Terminal 9. As discussed above, the DEIR asserts that passenger/operational capacity would be essentially unaffected by any of the Project's improvements. Because the DEIR does not acknowledge the Project's growth in passenger activity it also does not recognize the potential for passenger-related vehicular trips.

The flaws in the DEIR's trip generation estimates extend beyond the DEIR's failure to take into account vehicular trips from increased passenger activity. As transportation engineer Neal Liddicoat explains, the DEIR ignores any non-employee trips associated with the new concourse and terminal. Such trips might include, for example, deliveries, service trips, etc. Liddicoat Report at p. 10.

The DEIR also does not identify peak hour traffic volumes which are needed to determine specific project-related impacts on El Segundo. It is clear that LAWA's traffic consultants have prepared peak hour traffic volumes for the Project as they are referred to in the DEIR's Freeway Safety Analysis. *See* DEIR at p. 4.8-59; *see also* DEIR at p. 4.8-4 (acknowledging that the City of Los Angeles Citywide Model, which was used to analyze the proposed Project and alternatives, produces peak hour traffic data).

The EIR should be revised to correct these problems and recirculated for public review.

### **4. The DEIR Fails to Analyze the Project's Consistency with the City of El Segundo's Transportation Plans.**

The Los Angeles Department of Transportation indicates that a proposed project should be analyzed for conflicts with transportation-related programs, plans, ordinances, or policies. DEIR at p. 4.8-3. The relevant inquiry is whether the project would conflict with adopted programs, plans, ordinances, or policies addressing the circulation system including transit, roadways, bicycle, and pedestrian facilities. *Id.* The DEIR conducts such an evaluation for consistency with the City of Los Angeles, Los Angeles County

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Metropolitan Transportation Authority (“Metro”) and SCAG planning documents but does not evaluate the Project’s consistency with El Segundo’s transportation-related plans, programs, ordinances and policies. DEIR at pp. 4.8-20 through 4.8-23.

This analysis is particularly important because it is the policy of the City of El Segundo to require level of service (“LOS”) analyses for the purpose of assessing traffic impact fees; the City requires that intersections operate at LOS D or better. El Segundo also requires LOS analyses for the purpose of assessing traffic impact fees.

As the Liddicoat Report explains, the LAMP EIR evaluated the Project’s consistency with El Segundo’s LOS standards and determined that several intersections under the sole or joint jurisdiction of El Segundo were found to operate at LOS E or F. *See* LAMP DEIR at p. 4.12-92; Liddicoat Report at p. 12. This suggests a reasonable likelihood that a development of the magnitude of the Project would have a significant adverse impact on intersection operations in El Segundo, however, the DEIR ignores this possibility. *Id.* The revised EIR should evaluate the Project’s consistency with El Segundo’s transportation-related plans. This evaluation should ensure that the ATMP does not cause El Segundo intersections to fall below LOS E. *See* Exhibit 22, City of El Segundo General Plan Circulation Element Exhibit C-7. If this evaluation finds significant impacts, it must identify feasible mitigation for these impacts.

**5. The DEIR Fails to Adequately Analyze and Mitigate the Project’s VMT Impacts.**

**(a) The DEIR Substantially Underestimates the Project’s Potential to Increase VMT.**

Notwithstanding the flaws in the DEIR discussed above regarding the document’s reliance on a faulty baseline and its failure to analyze impacts beyond 2028, the DEIR underestimates the Project’s potential to increase VMT for additional reasons. These points are summarized below; we refer you to the Liddicoat Report for a detailed accounting of these issues.

The DEIR’s VMT analysis addresses three forms of VMT: (1) Daily VMT per Employee; (2) Daily Passenger VMT; and (3) Induced VMT (VMT that is unrelated to airport trips, but is related to the improved roadway operations on nearby surface streets as a result of the Project’s roadway projects). DEIR at pp. 4.8-9, 4.8-14. The DEIR concludes that the Project would cause significant impacts with respect to all three types, and that only VMT per Employee could be mitigated to a less than significant level. The

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DEIR determines that the impacts relating to Passenger VMT and Induced VMT would be significant and unavoidable.

As the Liddicoat Report explains, it is unclear whether the DEIR's roadway network assumptions accurately account for the Project's travel paths and the associated distances required of visitors to LAX. Liddicoat goes on to state, "[s]ome of the ATMP-proposed travel paths are substantially different from the travel paths associated with the approved LAMP project, Phase 1 of which serves as the baseline for the ATMP Project analysis. And, more to the point, it is uncertain whether the model-generated VMT values fully account for the travel distances directly associated with the proposed ATMP Project roadway system change." Liddicoat Report at pp. 2, 3. The Liddicoat Report determines that implementation of the Project will modify certain travel paths for traffic entering and exiting the LAX CTA, compared to the approved LAMP Phase 1 roadway system. In some cases, the travel paths proposed for the Project are substantially longer than would exist under the LAMP Phase 1 plan yet the DEIR fails to account for these differences. Liddicoat calculated the increase in travel between various points at the airport under the LAMP and ATMP:

- *From El Segundo to the CTA via Northbound Sepulveda Boulevard:* GCTC estimates that the proposed ATMP routing will add roughly 3,900 feet (0.74 mile) to the travel distance for drivers.
- *From the CTA to El Segundo via Southbound Sepulveda Boulevard:* The travel distance following the loop would add about 5,000 feet (almost 0.95 mile).
- *CTA Upper Level Loop to Southbound Sepulveda Boulevard:* Use of that loop ramp, which is approximately 1,700 feet (0.32 mile) long, would not be necessary under the LAMP Phase 1 scheme.
- *From Southbound Sepulveda Boulevard to the CTA:* GCTC estimates the length of this out-of-direction travel at about 3,200 feet (0.61 mile).
- *From the CTA to Northbound Sepulveda Boulevard:* The additional travel distance on the proposed Project road system is estimated at 1,220 feet (0.23 mile), compared to the LAMP Phase 1 system. *See* Liddicoat Report at pp. 2 through 7.

As shown above, the Project's proposed roadway changes would cause substantially greater travel time and distance compared to the LAMP which will equate to an increase in VMT compared to the LAMP. In particular, Liddicoat calculated the

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increase in VMT attributable to the Project's roadway system modifications identified in the above bullet points (79,960) and compared that figure to the DEIR's estimated increase in Passenger VMT (32,786). *See* Liddicoat Report at pp. 5 through 7.

In addition to the DEIR's failure to acknowledge the increase VMT resulting from the change in travel paths, the DEIR fails to acknowledge that the Project would erode certain of the trip reduction benefits of the LAMP, thereby further increasing VMT. Specifically, the LAMP was intended to encourage transit ridership at LAX. Yet, as the Liddicoat Report explains, the DEIR touts the ability of the ATMP to "improve overall access to and from the CTA" (DEIR at p. 2-39), "reduc[e] traffic congestion on Sepulveda Boulevard" (DEIR at p. 2-39), and "help keep airport-related traffic congestion and back-up off public streets" (DEIR at p. 2-10). These roadway improvements would have the effect of improving the attractiveness of LAX for both airlines and passengers and would clearly result in additional vehicular traffic and VMT. *See* Liddicoat Report at p. 10.

The revised EIR must be revised to provide accurate VMT estimates. As the VMT estimates are used to calculate air quality and greenhouse gas emissions, the revised DEIR must recalculate these emissions as well.

**(b) The DEIR Lacks Evidentiary Support that the Mitigation Measure (ATMP)-1 VMT Reduction Program Would Effectively Reduce the ATMP's VMT-related Impacts.**

The DEIR determines that the trip reduction strategies included in MM-T (ATMP)-1 VMT Reduction Program would reduce the Project's increase in Employee-related VMT to a less than significant level. DEIR at pp. 4.8-54, 4.8-57. The DEIR also relies on this same mitigation measure to reduce the increase in Passenger VMT and Induced VMT. While certain of the strategies identified in this measure might result in some level of trip reduction, the measure does not provide the necessary concrete steps ensuring that specific trip reduction will be achieved. Consequently, the DEIR lacks the required substantial evidence that MM-T (ATMP)-1 would reduce the Project's Employee-related VMT impacts to a less than significant level.

One of the strategies in MM-T (ATMP)-1 is the expansion of LAWA's existing rideshare program. DEIR at p. 4.8-52. The measure states that LAWA has an opportunity to increase the frequency and diversify the format of trip-reduction marketing and promotions to LAWA employees but it does not describe LAWA's existing trip-reduction marketing and promotions so it is not possible to determine how an increase in

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frequency or a diversification of such a program would result in increased trip reduction. Uncertain, vague, and speculative mitigation measures have been held inadequate because they lack a commitment to enforcement. *See, e.g., Anderson First Coalition v. City of Anderson* (2005) 130 Cal.App.4th 1173, 1188-89 (holding traffic mitigation fee measure inadequate under CEQA due to vagueness in program for implementing required improvements).

In addition, while MM-T (ATMP)-1 calls for LAWA to provide enhanced commuter incentives, including transit subsidies (DEIR at p. 4.8-55), these references are also excessively vague and therefore unenforceable. The DEIR does not describe LAWA's existing commuter benefit program and does not describe how commuter incentives and carpool benefits would be expanded. This measure could be strengthened—and made enforceable—by requiring that LAWA offer financial incentives for its employees similar to the program the City of San Francisco requires of its businesses. San Francisco's Commuter Benefits Ordinance requires businesses to offer transportation benefits (e.g., a monthly pre-tax deduction, up to \$265/month, to pay for transit or vanpool expenses) that provides financial incentives to encourage employees to bike, take transit and carpool to work. City of San Francisco Commuter Benefit Ordinance.<sup>51</sup>

Other strategies included in MM-T (ATMP)-1, while potentially promising, are similarly vague and therefore unenforceable. For example, the DEIR calls for conducting a parking study to price parking to reduce VMT. DEIR at p. 4.8-54. Increasing the price of parking is an effective method to reduce vehicular trips, yet the DEIR does nothing other than promise to study the issue. To be an effective mitigation measure, LAWA must commit to take action once the study is completed (e.g., LAWA could commit to increase the price of parking annually until it receives its targeted VMT reduction). Another strategy in MM-T (ATMP)-1 calls for LAWA to evaluate the potential for modifications to FlyAway bus service to reach new geographical areas. DEIR at p. 4.8-55. Here too, LAWA can and should do more. There is no reason why LAWA could not commit to take specific action upon completion of the study.

The DEIR cannot rely on this flawed mitigation measure to conclude that the Project's employee VMT impacts would be less than significant. Again, LAWA can and must do more. In addition to implementing enhanced commuter incentives, LAWA could expand the provision of its on-demand micro-transit shuttle to include the City of El

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<sup>51</sup> Available at <https://sfenvironment.org/commuter-benefits-ordinance-sf>; last accessed Feb. 9, 2021.



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Segundo. *See* DEIR at p. 4.8-53. Given the proximity of El Segundo to LAX, LAWA should offer shuttle service between El Segundo and the airport. This shuttle service should include LAWA and LAX employees who live in El Segundo as well as El Segundo residents who travel to and from LAX.

LAWA should also install bus stop improvements within El Segundo to facilitate travel between El Segundo and the airport. Currently, Metro's NextGen study eliminates bus stops on Imperial Highway. These changes are scheduled to go into effect in early 2021. The revised EIR should add the following mitigation measure: "To the extent that transit service is provided by either Metro or a different provider, LAWA will work with El Segundo to improve the transit stops that are active. The improvements will focus on the safety and convenience of transit users, especially those traveling to and from jobs located on the north side of Imperial Highway."

#### **6. The DEIR Errs In Its Analysis of Freeway System Impacts.**

As the Liddicoat Report explains, the DEIR ignores the Project's impacts on the freeway system, as the "freeway safety analysis" does nothing to address operational or safety conditions on the I-405 freeway mainline. Liddicoat Report at p. 12. On the other hand, the LAMP EIR examined 46 freeway segments in the vicinity of LAX. (i.e., each direction of 23 individual segments). Of those, 26 were found to operate at LOS E or F in the AM peak hour under 2035 Future with Project conditions. In the PM peak hour, 23 such segments were identified. *Id.* This suggests a need to evaluate the potential impacts of the ATMP on the freeway system serving LAX and surrounding jurisdictions. The analysis of freeway operations should be revised to also address whether implementation of the ATMP would encourage drivers to use Sepulveda Boulevard/Pacific Coast Highway as an alternative to I-405. The revised EIR must disclose whether the ATMP would cause sufficient congestion on the freeway to divert drivers to the nearby arterial roads. Such an analysis must consider the effects of the widespread use of cell phone apps (such as Waze, Google Maps, and others) and in-car navigation systems, which often encourage drivers to divert to alternative routes.

Liddicoat uncovered several additional flaws in the DEIR's freeway impact analysis. First, the DEIR determines that the Project would cause only one freeway off-ramp serving LAX to have 25 or more peak-hour trips. As the Liddicoat Report explains, this low volume of traffic appears highly unrealistic. A review of LAWA's November 2019 Traffic Generation Report reveals that in the peak month (i.e., August) an average of 5,202 vehicles entered the CTA in the AM peak hour and 4,909 did so in the PM peak hour. *See* Liddicoat Report at p. 15: "While we recognize that not all of the off-ramp left

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turns are bound for the CTA, we believe this provides a reasonable indication that the estimated ATMP Project volumes are not valid, as they appear to understate the volume of ATMP Project generated traffic at the off-ramp.”

Second, the DEIR assumes that at the Century Boulevard off-ramp from I-405 northbound, traffic volumes in the 2028 Baseline scenario are 90-95 percent lower than the Existing volumes. *See* Liddicoat Report at p. 15. Specifically, in the AM peak hour, the northbound right-turn volume is shown to decline from 308 existing vehicles to 14 vehicles in the 2028 Baseline scenario, a reduction of 294 vehicles. In the PM peak hour, that right-turn movement is reduced from 394 vehicles (existing) to 38 vehicles (2028 Baseline), a difference of 356 vehicles. The 2028 Baseline Plus Project scenario’s right-turn volumes are even lower than the 2028 Baseline volumes, improbably suggesting that implementation of the Project would cause a reduction in traffic on that movement. *Id.* The only possible explanation for the reduction from Existing to 2028 Baseline conditions is that a significant roadway system modification is assumed that would divert traffic away from the northbound off-ramp, yet no such modification is described in the DEIR. Beyond this, it is difficult to imagine why addition of the Project traffic would result in a further reduction in the off-ramp volumes. *Id.*

The Liddicoat Report states that it is also difficult to understand why the northbound I-405 on-ramp volumes (i.e., eastbound right-turn) are unchanged in either the 2028 Baseline or Baseline Plus Project scenarios. Substantial growth is projected on the eastbound and westbound thru movements at this intersection. There is simply no rational explanation for these anomalies. Liddicoat Report at p. 15.

Third, although the DEIR does not discuss it, the Liddicoat Report explains that the queue length analysis worksheets reveal substantial operational deficiencies on Century Boulevard. Liddicoat Report at p. 15. In particular, the queue on the westbound Century Boulevard thru movement at the I-405 Northbound Off-ramp/Century Boulevard intersection is projected to be 662 feet (27 vehicles) long in the AM peak hour under 2028 Baseline Plus Project conditions. In the PM peak hour, that queue would be 309 feet (13 vehicles) long. However, only approximately 200 feet exist between the subject intersection and the next intersection to the east (Century Boulevard/Felton Avenue). Thus, in both peak-hour periods, the Felton Avenue intersection would be blocked by westbound vehicles on Century Boulevard, as would several driveways serving private properties. *Id.* More importantly, perhaps, given the freeway-related intent of the analysis, the eastbound thru queue in the PM peak hour at this intersection would be 652 feet (27 vehicles) long, which would be sufficient to block access to the I-405 northbound on-ramp. As Liddicoat opines, perhaps this is the reason for the illogical lack of growth

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in the I-405 on-ramp traffic, as described above. Liddicoat Report at p. 15. Moreover, the Liddicoat Report determined that more than 600-foot queue length estimates are shown on the analysis worksheet with a footnote stating, “95th percentile volume exceeds capacity, queue may be longer.” Thus, the situation might well be worse than described here, with even greater traffic obstructions prevailing. Liddicoat Report at p. 16.

In sum, the DEIR’s “freeway safety analysis” is highly flawed, to the point where, according to Liddicoat, the results are simply not credible. Liddicoat Report at p. 16. The revised EIR must correct this deficient analysis.

**7. The DEIR Fails to Adequately Analyze Impacts Pertaining to Vehicular Access to Terminal 9 and These Impacts Would Appear to Be Significant.**

Vehicles traveling to the proposed Terminal 9 and its parking structure from northbound Sepulveda Boulevard would pass through a new traffic-signal-controlled intersection on Century Boulevard at the proposed new “A” Street. *See* Liddicoat Report at p. 13. Traffic from northbound Sepulveda Boulevard to eastbound Century Boulevard would pass through this same intersection, as would eastbound traffic departing the CTA. The DEIR provides no information regarding traffic operations at this location. Congestion at this location has the potential to cause vehicular queues on the eastbound intersection approach to back up onto northbound Sepulveda Boulevard and even into the Sepulveda Tunnel. In order to evaluate these potential impacts, the revised EIR must respond to the following questions:

- Upon completion of the Project and occupancy of Terminal 9 and its parking structure, how long would eastbound vehicular queues extend from the traffic signal-controlled intersection referenced above?
- Would the queues extend into the Sepulveda Tunnel?
- Would the queues extend onto northbound Sepulveda Boulevard/Pacific Coast Highway?
- What are the safety impacts on Sepulveda Boulevard/Pacific Coast Highway, particularly with regard to increased collisions due to development of Terminal 9 and its associated traffic?

Moreover, LAWA indicates that temporary access to Terminal 9 would be

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provided via direct ramps from northbound Sepulveda Boulevard while the Project improvements are being constructed. Two ramps are proposed, one to the arrivals level and one to the departure level.

- How long would vehicular queues on the inbound ramps (from northbound Sepulveda Boulevard/Pacific Coast Highway to Terminal 9) be?
- Would these queues exceed the lengths of the temporary ramps, thereby extending onto northbound Sepulveda Boulevard and creating a safety issue, particularly with regard to increased rear-end collisions?

In addition to providing answers to the aforementioned questions, the revised DEIR should explain whether LAWA considered other alternatives for vehicular access to/from Terminal 9, specifically with respect to traffic approaching/departing via Sepulveda Boulevard/Pacific Coast Highway in or through El Segundo. If such alternatives were not evaluated, given the potential for significant impacts from this access approach to Terminal 9, the revised EIR should consider redesigning the Project to avoid direct access to Terminal 9 from Sepulveda Boulevard, i.e., all vehicle access for Terminal 9 to and from Sepulveda Boulevard should use the same Sepulveda Boulevard on and off ramps as are used for CTA access. This would likely require that all of the LAMP roadway improvements (including as modified by the Project) would be completed prior to opening Terminal 9 so that there is no temporary or permanent direct vehicle access to Terminal 9 from Sepulveda.

#### **8. The DEIR Omits an Analysis of the Project's Construction-related Transportation Impacts.**

The DEIR fails to analyze the Project's construction-related transportation impacts. Given the proximity of El Segundo to LAX, along with the size of the Project and its lengthy construction schedule, these impacts to the City are likely to be extensive. We can find no logical explanation as to why the DEIR entirely ignores how construction of the Project would affect El Segundo roads and intersections.

As the Liddicoat Report explains, EIRs typically address the transportation-related impacts that will occur during a project's construction period. Liddicoat Report at p. 8. These analyses generally provide an estimate of the amount of construction-related traffic that will occur, in terms of construction worker commute trips as well as various forms of truck trips (goods/material deliveries, haul trips, etc.). Indeed, the LAMP EIR contained a highly-detailed construction traffic analysis, which encompassed 52 pages. That EIR

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determined that such impacts were significant and unavoidable. LAMP DEIR at p. 1-20.

Although the ATMP DEIR includes a cursory discussion of construction phasing, staging, contractor parking, and haul routes (DEIR at p. 2-77), the document lacks substantive detail and is therefore meaningless. For example, the DEIR states that, “employee contractor parking for the proposed Project would be located adjacent to or within the construction sites for the proposed facilities” and “[c]onstruction employees could be shuttled between construction sites and construction employee staging/parking areas, if/as warranted.” DEIR at p. 2-78. However, the DEIR provides no further detail. Moreover, use of unenforceable words and phrases such as “could” and “if/as warranted” provides no assurance that such measures will actually be implemented. While the DEIR does explain that LAWA intends to eventually identify construction haul routes and that it will prepare a Site Logistics Plan that will be submitted to the LAX Coordination and Logistics Management (“CALM”) Team (DEIR at p. 2-82), it contains no rationale for why this important information is not included in the DEIR.

Had the DEIR conducted the necessary analysis, it would have undoubtedly determined that the Project’s construction-related transportation impacts would be significant, thus triggering the requirement for mitigation. *See* Liddicoat Report at p. 8. Consequently, LAWA should adopt the following mitigation measures to reduce these impacts.

First, LAWA should cooperate with El Segundo as follows to reduce airport-related traffic congestion on City streets during ATMP construction:

- LAWA will develop and maintain a public information website re: Project status, scheduled lane closures, and other ATMP construction-related traffic impacts.
- LAWA will cooperate with El Segundo staff to provide residents with advance notice of ATMP construction-related lane closures and traffic impacts.
- LAWA will cooperate with El Segundo staff to evaluate and implement potential modification of timing of traffic signals in El Segundo to address ATMP construction-related traffic impacts.
- LAWA will reimburse documented El Segundo costs for addressing ATMP construction-related impacts (e.g., police dispatched to intersections due to severe traffic backup from lane closures).

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Second, LAWA should commit to involve El Segundo as a stakeholder when it selects final construction staging sites, contractor parking locations, and haul routes. The City should be included as a participant in the CALM Team meetings when issues relevant to El Segundo are discussed. The CALM Team should also include a qualified traffic engineer (licensed by the State of California as a Civil or Traffic Engineer) acceptable to the City of El Segundo, who would be responsible for monitoring construction-related traffic congestion and would have the authority to recommend timing plan changes for traffic signals within El Segundo and surrounding areas, when necessary.

Third, pursuant to LAWA's sustainability policy, LAWA should commit to limiting the use of the west end of Imperial Highway as a haul route due to proximity to El Segundo residences. If the west end of Imperial Highway must be used as a haul route, LAWA should report this publicly and to El Segundo.

Fourth, LAWA should undertake a process, in coordination with the City of El Segundo, to mitigate haul route pavement damage incurred as a result of the Project. This process would involve development of a baseline Pavement Condition Index ("PCI") for key roadways identified by El Segundo prior to initiation of construction work. *See* Liddicoat Report at p. 9. Following completion of the Project, the PCI evaluation process would be repeated, and LAWA would commit to undertaking any necessary pavement repairs, repaving, or roadway reconstruction, to the satisfaction of the City of El Segundo. During the course of the Project construction period, LAWA would also respond promptly to City requests for evaluation of specific areas of concern regarding pavement conditions. *Id.*

**D. The DEIR Fails to Adequately Analyze and Mitigate the Project's Air Quality Impacts.**

LAX is located within the City of Los Angeles, a location which has the worst air quality—with the highest observed ozone concentrations—in the United States. "Nearly Half of U.S. Breathing Unhealthy Air; Record-breaking Air Pollution in Nine Western Cities," American Lung Association, April 21, 2020<sup>52</sup> According to air pollution consultant Todd Tamura with Tamura Environmental, LAX's NOx emissions comprise a

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<sup>52</sup> Available at <https://www.lung.org/media/press-releases/state-of-the-air-2020>; last accessed Feb. 9, 2021.

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sizeable amount of the emissions in the entire South Coast Air Basin.<sup>53</sup> See Tamura Report at p. 1 (stating that “[t]he 2018 annual NOx emissions from LAX are over half of the emissions of all ‘point sources’ (permitted industrial sources) in the entire [South Coast Air Basin], and are more than double the combined NOx emissions of all the petroleum refineries in the Wilmington/ Carson/West Long Beach area.”). The DEIR confirms LAX’s contribution to local and regional air pollution. See DEIR at p. 3-2 (stating “[t]he existing air quality setting in the immediate vicinity of the Project site is dominated by air pollutants from aircraft activities, including landings and take-offs, taxiing, and other aircraft movements; vehicles on airport roads and surrounding roads and highways; and industrial uses.”). These air pollutant emissions from aircraft activity at LAX contribute to adverse health effects for communities in the LAX vicinity. Wendy Gutschow, “Airport pollution linked to acute health effects among people with asthma in Los Angeles,” USC Environmental Health Centers, February 14, 2019.<sup>54</sup>

In light of the severe air pollution in the Project study area, and the Project’s potential to exacerbate that pollution, one would expect the DEIR to provide a comprehensive analysis of the Project’s impacts and to thoroughly mitigate for these impacts. Yet, the DEIR fails to achieve CEQA’s most basic purpose: informing governmental decisionmakers and the public about the potential significant environmental effects of a proposed activity. CEQA Guidelines § 15002(a)(1).

**1. The DEIR Does Not Accurately Reflect the Full Extent Of the Increase In Emissions That Would Result From The ATMP.**

As discussed above, the DEIR repeatedly claims that the Project would have no growth effect on the passenger capacity of LAX because specific, quantified future “passenger activity . . . is anticipated to be realized with or without the proposed Project because the ability to accommodate the future aviation demand projected for LAX is not dependent on any of the improvements associated with the proposed Project.” DEIR at p. 6-5; *see generally* DEIR, Appendix B.1. As a result, the DEIR determines that the air pollutant emissions associated with aircraft (takeoff, climb-out and landing) would be essentially the same in 2028 regardless of the Project. DEIR at p. 4.1.1-47. However, the DEIR reaches this determination because it assesses impacts only through the year 2028,

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<sup>53</sup> Ozone forms as a result of volatile organic compounds (“VOCs”) and NOx in the presence of sunlight. VOCs and NOx are termed “ozone precursors” and their emissions are regulated in order to control the creation of ozone. DEIR at p. 4.1.1-3

<sup>54</sup> Available at <https://envhealthcenters.usc.edu/2019/02/ultrafine-particle-pollution-lax.html>; last accessed Feb. 9, 2021.

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immediately after the Project's construction would be completed, and before its impact on the airport's capacity would be realized.

The DEIR does compare the overall increase in airport emissions between 2018 and 2028 to CEQA's significance thresholds (and finds that the increases would be significant), but, again, the document assesses growth only during the construction period; it does not evaluate the impacts of the Project itself. This point is crucial. Although the DEIR asserts that the Project would result in a significant increase in NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and SO<sub>x</sub>, it is clear that the document actually attributes the increase in emissions between 2018 and 2028 to background growth. *See* DEIR at p. 4.1.1-45 (attributing the increases in NO<sub>x</sub> and SO<sub>x</sub> emissions to the increase in aircraft and APU activity in 2028 as compared to 2018, and the increase in PM<sub>10</sub> and PM<sub>2.5</sub> to increased VMT between 2018 and 2028).

Had the DEIR analyzed impacts beyond 2028, as CEQA requires, the Project's emissions would be far greater than the DEIR discloses. Clearly, the Airport will continue to operate—and the Project's effect on emissions will continue—well beyond 2028. As we have explained, passenger activity in the year 2045 is projected to be 127.9 MAP, which represents roughly a 50 percent increase over existing conditions and a 15 percent increase over the 2028 Baseline. Given these passenger activity estimates, it is highly unlikely that the greatest amount of Project-related emissions would be generated in 2028; rather it would occur at some point beyond that date. The DEIR's failure to recognize the Project's contribution to this growth and to disclose the associated environmental impacts both deprives the public and decisionmakers of information necessary to a full understanding of the Project's impacts, and divests the DEIR's significance conclusions of evidentiary support. CEQA requires lead agencies to use "best efforts" to estimate all "reasonably foreseeable" impacts. CEQA Guidelines §§ 15144, 15064(d).

Finally, as Tamura points out, a comprehensive analysis of the Project's impacts is required by Federal General Conformity regulations. The analysis of a project's conformity with the State Implementation Plan is required to be based on the total of direct and indirect emissions from the action and must address the year during which the total of direct and indirect emissions from the action is expected to be greatest. 40 C.F.R. § 93.159(d). Tamura Report at p.4.



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## 2. The DEIR Fails to Analyze the Health Impacts of Secondary Air Pollutants.

CEQA requires an EIR to discuss the specific human health effects that would occur as a result of a project's significant air pollutant emissions. *Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 517-522. The DEIR determines that operations-related emissions between 2018 and 2028 would exceed thresholds established by SCAQMD and concludes that, even with mitigation, this would remain a significant and unavoidable impact. DEIR at pp. 4.1.1-43, 4.1.1-44. As Tamura explains, these operations-related NOx emissions increases are 46 times greater than the SCAQMD's thresholds. Tamura Report at p. 6. Accordingly, the DEIR should have related the Project's emissions to likely health consequences so that the public is apprised of these impacts and so decisionmakers could make informed decisions regarding the costs and benefits of the Project.

Although the DEIR acknowledges its obligations under CEQA, it declines to conduct this necessary health impact analysis. Instead, the DEIR looks to the health impact analyses prepared in connection with two other recent EIRs and concludes that the human health impact assessments for those projects did not "move the dial" with regard to regional human health impacts. DEIR at p. 4.1.1-17. The two EIRs the DEIR relies on are the Norman Y. Mineta San Jose International Airport Master Plan ("San Jose Airport EIR") and the Inglewood Basketball and Entertainment Center Project ("IBEC EIR"). Both the San Jose Airport EIR and the IBEC EIR conducted the necessary health impact analyses for their respective projects, as CEQA requires. DEIR at p. 4.1.1-15. Yet, the ATMP DEIR dismisses its obligation to conduct a health impact assessment for the Project, claiming that the level of effort to do would be substantial in terms of schedule and personnel hours and because the analyses conducted for the San Jose Airport and IBEC projects found negligible changes to regional health impacts. DEIR at p. 4.1.1-17.

Tamura reviewed the health impact assessments prepared for the San Jose Airport and IBEC projects. He determined that the IBEC Project did not have comparable NOx emissions to the Project (i.e., the ATMP would generate substantially greater NOx emissions than would the IBEC Project). The San Jose Airport Project EIR identified current (2018) NOx emissions of 3,853 lb/day (far less than LAX's current 30,690 lb/yr) and estimated that these emissions would increase by 5,325 lb/day by 2037 (19 years out). Tamura Report at p. 7.

Unlike the San Jose Airport EIR which calculated emission increases over a 19-year period, the ATMP DEIR evaluated emissions over only a 10-year period. Despite

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this different in forecasting timeframe, the ATMP DEIR concludes that:

[i]f the proposed Project emissions were applied to the SJC site, the resulting health impacts from ozone would likely be the same as, or less than, those modeled for the SJC Master Plan Amendment Draft EIR...the resulting change in health end-point incidences would be <0.05 percent for both ozone and PM2.5 emissions.

DEIR at p. 4.1.1-42. According to Tamura, there are several flaws with the DEIR's discussion of this topic:

- As discussed previously, the DEIR does not accurately reflect the full extent of the increase in emissions that would result from the ATMP because it only identifies the “proposed Project emissions” between 2018 and 2028.
- The DEIR incorrectly attempts to apply the Project's emissions to the San Jose Airport site. The DEIR neglects the well-established fact that ozone impacts are not a function of project emissions alone, they are a complex function of NO<sub>x</sub> and VOC emissions in the surrounding environment, meteorology (including sunlight/temperature), and topography. All of these factors necessarily differ between the South Coast Air Basin and the San Francisco Bay Area Air Basin (the location of the San Jose Airport). Therefore, making a quantitative statement regarding the Project's ozone impacts based on applying its emissions to photochemical modeling conducted in San Jose is not valid.
- The DEIR provides no explanation as to how it determines that the Project's health impacts would be the same or less than those generated by the San Jose Airport Project. Tamura Report at p.7.

Nor can the DEIR dismiss its obligation to conduct the required health impact analysis because it would require substantial effort. As explained by the Court in *Laurel Heights Improvement Ass'n of San Francisco v. Regents of the University of California* (1988) 47 Cal.3d 376, 399 (“*Laurel Heights I*”), “[w]e find no authority that exempts an agency from complying with the law, environmental or otherwise, merely because the agency's task may be difficult.”

As Tamura explains, given the magnitude of the NO<sub>x</sub> emissions associated with LAX, as well as the climate and topography of the South Coast Air Basin, it is hard to imagine a site more deserving of photochemical grid modeling than this one. Tamura

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Report at p.8. Given that the Project's NO<sub>x</sub> emissions—generated during the truncated 10-year analysis period (2018 Baseline to 2028 With Project) alone—would far exceed the SCQAMD's significance thresholds, the EIR must be revised to relate the expected adverse air quality impacts (pollutant concentrations) to the Project's likely health consequences. As the San Jose Airport and IBECs EIRs have clearly demonstrated, it is feasible to conduct such health impact analyses.

### **3. The DEIR Understates the Project's Air Quality Impacts Because it Underestimates Emissions.**

In addition to the DEIR's failure to acknowledge air pollutant emissions from the Project's operational growth beyond 2028, the DEIR underestimates the Project's potential to increase emissions for the following reasons.

First, in its calculation of the Project's air pollutant emissions, the DEIR assumes emission reductions from the LAMP's transportation projects. *See* DEIR at pp. 4.1.1-18, 4.1.1-19. However, the DEIR lacks evidentiary basis that these LAMP projects would reduce emissions. As discussed above, although the DEIR does not acknowledge it, the Project would erode the trip reduction benefits of the LAMP's transportation projects (i.e., the Project would erode the increases in transit ridership and the decreases in vehicular trips that were intended to result from the LAMP projects). Consequently, the Project cannot assume emission reductions from the LAMP's transportation projects. If LAWA insists on assuming emission reductions from the LAMP projects, to be truly transparent, the revised EIR must specifically demonstrate how each LAMP transportation project would reduce emissions.

Second, the DEIR also underestimates the Project's increase in criteria air pollutant emissions, because it does not account for all of the vehicular travel to and from LAX. As explained in Part V.C, the DEIR only accounts for a portion of the VMT that would be generated by the ATMP. Consequently, the DEIR must be revised to include air pollutant emissions from all of the vehicular travel associated with the Project.

Third, the DEIR incorrectly assumes emission reductions from certain LAWA plans, measures and policies (DEIR pp. 4.1.1-25, 4.1.1-26), yet the document does not provide the necessary assurance that these plans, measures and policies will be implemented or would provide meaningful emission reductions. Examples of these plans, measures and policies include the following:

- Use of grid based electric power at construction sites. This LAWA policy states

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that “[e]very effort shall be made to utilize grid-based electric power at any construction site, where feasible . . . .” DEIR at p. 4.1.1-27. This policy is written in a manner that does not ensure any action by LAWA as it includes language such as “every effort” and “where feasible.”

- Use of USEPA Tier 4 standards. This policy states that “off-road diesel-powered equipment are required to meet USEPA Tier 4 (final) standards or the next cleanest equipment available, as approved by LAWA, with some exceptions.” DEIR at p. 4.1.1-27. This policy does not ensure any action by LAWA because it allows for, but does not define, the policy’s exceptions.
- LEED Certification. This policy calls for “LEED Silver certification if the project meets the U.S. Green Building Code (USGBC) and LAWA LEED® Eligibility Criteria, unless exempted by LAWA’s Sustainability Review Committee.” DEIR at p. 4.1.1-27. Because this policy allows LAWA to exempt a project from meeting LEED Silver certification, but does not provide any explanation as to why such exemptions could be given, it does not commit LAWA to take action.
- Electrification of Aircraft Parking Positions. The DEIR assumes air pollutant emission reductions from the electrification of all new aircraft parking (DEIR p. 4.1.1-26; 4.1.1-27), yet there is no assurance this electrification will occur and pre-conditioned air will be provided. *See* DEIR at p. 4.1.1-27 stating that “[a]ll new aircraft parking positions shall be installed with ground power and pre-conditioned air, where applicable. . . .” By including language such as “where applicable,” the DEIR does not provide certainty that emissions will be reduced. LAWA must confirm that all new aircraft parking positions shall be electrified and pre-conditioned air will be provided. Alternatively, the DEIR should not assume emissions reductions from the electrification of aircraft parking.

The DEIR errs by assuming emission reductions from measures such as the aforementioned. The DEIR should have calculated the Project’s emissions without these plans, measures and policies. The revised EIR should correct all of the aforementioned issues and revise its emissions estimates.

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#### 4. The DEIR's Air Quality Mitigation Measures Fail to Satisfy CEQA's Standards

##### (a) The Measures Discussed in the ATMP DEIR Are Impermissibly Vague and Unenforceable.

The DEIR identifies several mitigation measures that would allegedly reduce the ATMP's significant air quality (and GHG) impacts. These measures—MM-AQ/GHG (ATMP)-1: Rock Crushing Operations; MM-AQ/GHG (ATMP)-2: Use of Renewable Diesel Fuel; MM-AQ/GHG (ATMP)-3: Parking Cool Roof; MM-AQ/GHG (ATMP)-4: EV Charging Infrastructure; and MM-AQ/GHG (ATMP)-6: Solar Energy Technology—fail to commit LAWA to specific, enforceable actions that will reduce or avoid Project emissions to the extent feasible. Mitigation measures proposed in an EIR must be “fully enforceable” through permit conditions, agreements, or other legally binding instruments that will ensure the measures are actually implemented—not merely adopted and then disregarded. Pub. Resources Code § 21081.6(b); CEQA Guidelines § 15126.4(a)(2); *Anderson First Coalition*, 130 Cal.App.4th at 1186-87; *Federation of Hillside & Canyon Assns.*, 83 Cal.App.4th at 1261.

MM-AQ/GHG (ATMP)-1: Rock Crushing Operations calls for contractors to conduct rock-crushing operations on-site and to reuse waste rock. DEIR at p. 4.4-31. This measure is vague and unenforceable and provides no assurance that the measure will actually be implemented. It includes non-committal language “to the maximum extent feasible” (DEIR at p. 4.4-31) and does not explain how a determination of feasibility would be made.

Similarly, MM-AQ/GHG (ATMP)-2 calls for use of renewable diesel fuel for equipment and trucks *as feasible* based on commercial renewable fuel availability. DEIR at p. 4.4-31. Here too, the measure does not explain how LAWA will determine if the use of renewable diesel fuel is feasible. In particular, the measure calls for the use of fuels only if they are available at a “comparable price” and without incurring “a substantial transportation cost.” Yet, phrases such as “comparable price” and “substantial transportation cost” are vague and non-specific and the measure is therefore unenforceable.

MM-AQ/GHG (ATMP)-4 calls for LAWA to install electric vehicle (“EV”) charging infrastructure in the Terminal 9 parking facility. This measure also falls short of any specific, enforceable commitment to take action. Instead of providing detailed information as to how the measure will be implemented, the DEIR defers the

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identification of the number and types of Electric Vehicle Supply Equipment (“EVSE”) and Electric Vehicle Charging Stations (“EVCS”) parking spaces to a later date. “Formulation of mitigation measures should not be deferred until some future time.” CEQA Guidelines § 15126.4(a)(1)(B). However, where mitigation for an impact “is known to be feasible,” but where “practical considerations prohibit devising such measures early in the planning process,” an agency “can commit itself to eventually devising mitigation measures that will satisfy specific performance criteria articulated at the time of project approval.” *Cleveland National Forest Foundation v. San Diego Ass’n of Govt’s* (2017) 17 Cal.App.5th 413, 442-43 (“*Cleveland IP*”). In order to defer formulation of mitigation measures, therefore, an agency must demonstrate (a) that mitigation of the impact is feasible; (b) that practical considerations preclude devising measures at the time of review; (c) specific, articulated performance criteria that will avoid or lessen the impact; and (d) a binding commitment to adopt measures that will meet or exceed those performance standards. The DEIR provides no explanation as to why LAWA could not specifically identify the number and location of EV charging stations now, prior to Project approval.

In addition, while this measure calls for LAWA to exceed the minimum requirements for EVSE and EVCS “specified in the code” by 5%, it does not identify the code or the code requirements so it is not possible to determine whether this measure would in fact result in an exceedance of the code’s requirements. Nor does the DEIR explain how it arrived at this 5% figure nor whether LAWA could exceed this 5% figure. Given that the Project’s criteria air pollutant and GHG emissions have been determined to be significant and unavoidable impacts, LAWA must examine whether it can feasibly increase the amount of on-site EV infrastructure at LAX.

MM-AQ/GHG (ATMP)-6: Solar Energy Technology (and corresponding Measure #50 in DEIR Appendix C.9-1) are similarly deficient. These measures call for the installation of building-mounted solar photovoltaic panels and the installation of solar thermal systems for hot water production. DEIR at p. 4.4-32; DEIR, Appendix C.1 at p. C.9-8. These measures fail to commit LAWA to take any action at all. Measure #50 explains that LAWA committed to including four megawatts of solar energy as part of the LAMP; however, as regards the ATMP, it asserts that LAWA would implement solar “where feasible based on costs, grid tie-in capability, environmental clearance, compliance with FAR Part 77, and FAA requirements for land leases and funding as applicable.” *Id.* Consequently, Measure #50, and by association MM-AQ/GHG (ATMP)-6, provide no assurance that solar would in fact be implemented in connection with the ATMP. LAWA has demonstrated the feasibility of solar energy technology by

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committing to install four megawatts as part of the LAMP; it should commit to installing an equal or greater amount of solar in connection with the ATMP.

**(b) Additional Potentially Feasible Mitigation Must Be Considered.**

The DEIR explains that, in addition to the aforementioned mitigation measures, LAWA has compiled a broad array of additional measures, some of which are already being implemented at LAX under existing LAWA programs, while others would purportedly be incorporated into the ATMP as “Project Features.” DEIR at p. 4.1.1-43. The DEIR further states that of the remaining measures, some were considered feasible to add as mitigation measures for the Project, while others were determined to be not applicable or feasible to include as mitigation for the Project. The DEIR directs the reader to DEIR Appendix C.9 which includes a table of these 93 measures.

A review of these additional measures reveals significant shortcomings. First, measures that either are already part of the Project or that LAWA has already implemented in connection with prior projects are not “mitigation.” An EIR must “separately identify and analyze the significance of impacts . . . before proposing mitigation measures.” *Lotus v. Dept. of Transportation* (2014) 223 Cal.App.4th 645, 658. When an agency folds discussion of mitigation into discussion of the project and impacts, this “subverts the purposes of CEQA,” because it results in omission of “material necessary to informed decisionmaking and informed public participation.” *Id.*; see also *Cleveland II*, 17 Cal.App.5th at 443 (questioning whether measures already incorporated into a project “even qualify as mitigation measures”). Other measures that already exist are reflected in the existing conditions baseline, and by definition cannot avoid or reduce any emissions of the Project.

Moreover, many of the measures that purportedly will be incorporated into the ATMP also fall short of any specific, enforceable commitment to take action. LAWA can and should do more to mitigate the Project’s significant air quality impacts. Examples of these deficient measures include the following:

- Measure #4: Ground Support Equipment (“GSE”). This measure calls for LAWA to replace airport sponsor-owned conventionally-fueled equipment with electric or hydrogen-powered counterparts. See DEIR, Appendix C.9-1 at p. C.9-3. Appendix C.9-1 explains that while LAWA does not own or operate GSE it does impose requirements on airlines and GSE operators to reduce emissions at LAX. It also explains that LAWA has adopted the LAX Electric Ground Support Equipment

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Incentive Program in 2019 with \$500,000 from LAWA's own funds to accelerate the use of zero-emission GSE at LAX. *Id.* The DEIR does not specifically identify or describe the requirements that LAWA currently imposes on airlines and GSE operators nor does it describe the LAX Electric Ground Support Equipment Incentive Program. Accordingly, it is impossible to determine which measures might or might not be incorporated into these requirements or LAX's program, whether those measures are concrete and enforceable, or to what extent any such measures might actually reduce emissions. Nor does the DEIR explain why LAWA caps its funding at \$500,000. LAWA should commit to substantially increasing the amount of funding so as to dramatically increase zero-emission GSE at LAX.

- Measures #24, #55, #59, #76, and #77 call for using airport-specific sustainable measures including the development of energy-efficient facilities and equipment. *See* DEIR, Appendix C.9 at pp. C.9-5, C.9-8, and C.9-10. These measures have promising titles but the majority are described in such vague and general terms that they appear to be optional and therefore unenforceable. In particular, Measure #55 calls for "energy-efficient" terminal development projects, including baggage claim delivery areas, automated baggage-handling equipment, public-use corridors to boarding areas, central waiting rooms, restrooms, holding areas, foyers and entryways, and passenger loading bridges while Measure #24 states that development of Concourse 0 and Terminal 9 would achieve LEED Silver. Does this mean that these measures require that all of the facilities and equipment in Concourse 0 and Terminal 9 would achieve LEED Silver? The DEIR does not tell us. Moreover, the DEIR provides inconsistent and contradictory language regarding whether LAWA construction or renovation projects would even have to meet LEED Silver Certification. *See* DEIR at p. 4.1.1-27, stating that building construction or renovation projects would be required to meet LEED Silver certification, "unless exempted by LAWA's Sustainability Review Committee". Because this measure allows LAWA to exempt a project from meeting LEED Silver Certification, but does not provide any explanation as to why such exemptions could be given, it does not commit LAWA to take action. Again, given that the Project's air quality and GHG impacts are significant and unavoidable, LAWA can and should do more. LAWA should commit to implementing LEED Platinum certification.

In short, the DEIR impermissibly leaves a long list of potentially feasible mitigation measures on the table, and thus cannot support the findings CEQA requires.



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Simply declaring the Project's air quality impacts significant and unavoidable is insufficient. LAWA must do everything it feasibly can to reduce or avoid emissions.

In addition to the enhancements to the mitigation measures discussed above, the revised EIR should include the following mitigation measures to reduce the Project's significant air quality impacts:

- LAWA shall provide El Segundo annually a copy of the emissions inventory LAWA provides annually to SCAQMD. LAWA shall consult with El Segundo and include it as a stakeholder should LAWA and/or SCAQMD propose any new, upgraded and/or additional air quality monitors within El Segundo's municipal boundaries.
- To reduce air pollution emissions at LAX, LAWA has consistently committed to provide ground power at aircraft gates and parking places to eliminate the need for aircraft to operate their auxiliary power units ("APUs") while parked at LAX. It is clear however that certain aircraft gates and parking positions are not currently electrified. *See* DEIR at 4.1.1-11 identifying the APU operating times for those parking positions that *do not* have gate power and pre-conditioned air. Consequently, to mitigate for the ATMP's significant air quality impacts, LAWA should adopt the following mitigation measures:
  - LAWA shall produce and publish on its website an annual "snapshot" report/map showing the current location of all aircraft gates and parking places in existence at LAX and whether they are currently equipped with ground power and/or pre-conditioned air. As part of this inventory, LAWA shall identify all existing LAX passenger gates (contact and remote), remain all day ("RAD") parking places, remain overnight ("RON") parking places, cargo aircraft loading positions, and maintenance positions and clearly disclose whether each location has or does not have ground power and/or preconditioned air.
  - LAWA shall commit to installing ground power to all parking positions that do not yet have such upgrades and LAWA shall identify the schedule for when such power will be installed.
  - LAWA shall commit to including preconditioned air at all gates and RON/RAD parking positions, particularly if aircraft using those positions would otherwise need to run their APUs to stay cool/get ready for passengers.

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**5. LAWA Must Produce Documents In Response to El Segundo's November 24, 2020 Request Pursuant to the California Public Records Act.**

LAWA previously produced an e-mail dated May 1, 2019 from Lijun Sun, SCAQMD, in response to our November 24, 2020 CPRA request. That document includes the following statement: "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)." Please include SCAQMD's comments on the Notice of Preparation for the ATMP in either the revised ATMP EIR or the Final EIR.

LAWA previously produced a memorandum from CDM Smith dated June 19, 2020 in response to our CPRA request. That memorandum states that responses to comments (in connection with the LAX ATMP Final CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Air Pollutants) were received from the USEPA, CARB and the SCAQMD. Please include the USEPA's, CARB's, and SCAQMD's comments on the LAX ATMP Final CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Air Pollutants in either the revised ATMP EIR or the Final EIR.

LAWA previously produced an email from Jillian Wong, SCAQMD, dated May 20, 2020 in response to our November 24, 2020 CPRA request. This email states that Ms. Wong intended to send a "formal response with [the SCAQMD's] concerns and comments by the end of the week." Please include the SCAQMD's formal response in either the revised ATMP EIR or the Final EIR.

LAWA previously produced an email from Michael T. Benjamin, CARB, dated May 20, 2020 in response to our CPRA request. This email states that CARB has "ongoing concerns about the approach being taken [with regard to the air quality modeling protocol] and will be providing a formal response with comments by the end of the week." Please include CARB's formal response in either the revised ATMP EIR or the Final EIR.

**E. The DEIR Fails to Adequately Analyze and Mitigate the Project's Climate Change Impacts.**

The DEIR's failure to accurately account for and disclose all of the Project's

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greenhouse gas emissions prejudicially impairs the ability of decisionmakers and the public to understand the Project's cumulative contribution to climate change. The DEIR's conclusion that climate impacts are significant and unavoidable cannot excuse the DEIR's deficiencies. "[A]n EIR's designation of a particular adverse environmental effect as 'significant' does not excuse the EIR's failure to reasonably describe the nature and magnitude of the adverse effect. [Citations.] An adequate description of adverse environmental effects is necessary to inform the critical discussion of mitigation measures and project alternatives at the core of the EIR." *Cleveland National Forest Foundation*, 3 Cal.5th at 514-15. A revised DEIR must be prepared that fully and accurately discloses all of the Project's emissions and its contribution to climate change.

As with other environmental impact categories, the overarching flaw in the DEIR's analysis of climate change impacts is the document's refusal to acknowledge GHG emissions that would clearly be caused by the Project. It fails to account for GHG emissions beyond 2028 despite the fact that the Project will have a lifespan beyond this seven year period. The document also fails to adequately analyze conflicts with state and regional GHG reduction plans and policies and it fails to identify mitigation measures to reduce or avoid the Project's contribution to climate change. The DEIR's approach stands in stark contrast to LAWA's self-touted leadership on climate change issues in the region. *See, e.g.*, LAWA Sustainability Action Plan 2019 at p.1 (claiming that LAWA has "adopted aggressive sustainability targets, invested in green infrastructure, and pushed for carbon neutrality.").<sup>55</sup> LAWA must make substantial modifications to the DEIR's climate change analysis to achieve compliance with CEQA and to affirm its commitment to curbing climate change.

### **1. The DEIR Fails to Disclose All Relevant GHG Emissions.**

Like all significance determinations under CEQA, "[t]he determination of the significance of greenhouse gas emissions calls for a careful judgment by the lead agency." CEQA Guidelines § 15064.4(a); *see also id.*, § 15064(b) (significance determination "calls for careful judgment . . . based to the extent possible on scientific and factual data"). Where, as here, an agency uses a model or methodology to quantify project emissions, it must support its chosen methodology with substantial evidence, and must "explain the limitations of the particular model or methodology selected for use." *Id.*, § 15064.4(a). CEQA, moreover, requires analysis of the "whole of [the] action" before the lead agency (CEQA Guidelines § 15378(a)) not just isolated components of a

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<sup>55</sup> Available at <https://cloud1law.aapp.box.com/s/63i2teszgnld5aws68xbou6yc0inl5rp>; last accessed February 22, 2021.

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project. An EIR's failure to disclose the information CEQA requires, in a manner that deprives the public and decisionmakers with a "full understanding of the environmental issues" raised by a project, is legal error. *Banning Ranch Conservancy v. City of Newport Beach* (2017) 2 Cal.5th 918, 942.

In assessing GHG emissions, an EIR must "reasonably evaluate [the] downstream impacts" of long-range projects that remain in the environment for many years, exerting an influence on travel behavior and emissions. *Cleveland National Forest Foundation*, 3 Cal.5th at 513. This Project—which will influence both aviation activity and regional transportation for decades to come—requires a comprehensive and honest analysis.

**(a) The DEIR Fails to Disclose the Project's Indirect Emissions.**

The DEIR fails to provide a full and accurate inventory of the Project's indirect GHG emissions. Rather, the DEIR estimates emissions only from a subset of sources: aircraft, auxiliary power units ("APUs"), ground service equipment ("GSE"), "stationary sources," and motor vehicles. DEIR at p. 4.4-5; DEIR Table 4.4-5 at p. 4.4-29. "Stationary sources" appear to consist only of the boilers used for heating and cooling and for emergency generators. DEIR at p. 4.4-5; DEIR, Appendix C at p. 3-5. The DEIR thus omits from its inventory GHG emissions associated with, at a minimum, electricity, natural gas usage, solid waste disposal, water, usage and wastewater disposal (referred to as "indirect emissions) in the airport's terminals and other facilities. The DEIR omits these "indirect" emissions from both the construction and operational inventories.

The DEIR dismisses its obligation to include indirect emissions from the Project's construction activities, stating that they would be speculative and negligible compared to the direct emissions of the construction process. DEIR at p. 4.4-4. The DEIR fails to provide evidentiary support for its statement that these emissions would be speculative and negligible. Moreover, this approach is contrary not only to CEQA but also the guidance set forth by the California Air Resources Board which calls for consideration of indirect emissions so as to provide a more complete picture of the GHG footprint of a facility: "As facilities consider changes that would affect their emissions—addition of a cogeneration unit to boost overall efficiency even as it increases direct emissions, for example—the relative impact on total (direct plus indirect) emissions by the facility should be monitored." DEIR at pp. 4.4-3, 4.4-4. Additionally, the Governor's Office of Planning and Research's guidance for lead agencies conducting GHG analyses in CEQA documents indicates that lead agencies should "make a good-faith effort, based on available information, to calculate, model, or estimate . . . GHG emissions from a

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project, including the emissions associated with vehicular traffic, energy consumption, water usage and construction activities.” DEIR at p. 4.4-4. The revised EIR should include in its construction-related emissions estimates of all indirect sources of emissions.

The DEIR purports to include indirect GHG emissions in the Project’s operational emissions inventory (DEIR at 4.4-5) yet there is no evidence in the DEIR’s emissions calculations that such emissions have been included. *See* DEIR Table 4.4-5; DEIR at p. 4.4-5; DEIR, Appendix C at p. 3-5 (explaining that “stationary sources” consist only of the boilers used for heating and cooling and for emergency generators). If indirect emissions from, for example, electricity, natural gas usage, solid waste disposal, water, usage and wastewater disposal were in fact included in the DEIR’s operational emissions estimates, DEIR Table 4.4-6 should have been transparent in its identification of these emissions.

Because GHG emissions are a cumulative global effect, all sources of a Project’s emissions must be included in the inventory. The omission of indirect GHG emissions deprive the public and decisionmakers of information CEQA requires—information necessary to understand and comment meaningfully on the Project’s impacts.

**(b) The DEIR Underestimates Project-related Vehicular Increases in GHG Emissions.**

As discussed above, the Project will result in a substantially greater increase in VMT than the DEIR discloses. The transportation section is one of the largest sources of greenhouse gas emissions in the United States. In 2018, GHG emissions from transportation accounted for about 28% of total U.S. GHG emissions, making it the largest contributor of U.S. GHG emissions. Between 1990 and 2018, GHG emissions in the transportation sector increased more in absolute terms than any other sector. “Carbon Pollution from Transportation,” U.S. EPA.<sup>56</sup> By underestimating VMT, the DEIR also underestimates vehicular GHG emissions. The DEIR should be revised to include an accurate accounting of the Project’s GHG emissions resulting from the Project’s increase in VMT.

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<sup>56</sup> Available at <https://www.epa.gov/transportation-air-pollution-and-climate-change/carbon-pollution-transportation>; last accessed Feb. 9, 2021.

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**(c) The DEIR Incorrectly Incorporates Emission Reductions From LAWA’s Policies and Measures In its GHG Emission Calculations.**

The DEIR explains that LAWA has included several policies and measures that *may* reduce GHG emissions in its detailed calculations for the existing conditions and future with Project scenarios. DEIR at pp. 4.4-5, 4.4-6. The DEIR lacks evidentiary support that these policies and measures will in fact be implemented. Consequently, the DEIR should not have assumed emission reductions attributable to these policies and measures in the Project’s emissions’ inventory. For example, the DEIR assumes emission reductions from the implementation of Tier 4 Final Emission standards (DEIR at p. 4.4-6), yet there is no evidence that Tier 4 will be implemented. Similarly, the DEIR assumes emission reductions from the use of an on-airport concrete batch plant (DEIR at p. 4.4-6), but the DEIR fails to provide evidentiary support that on site rock-crushing operations will occur. DEIR at p. 4.3-31.

In other instances, the DEIR identifies policies but does not provide sufficient information to allow the reader to understand how the policy would be implemented, whether it would be effective in reducing emissions, or to verify the amount of emission reduction associated with the policy. For example, the DEIR attributes unspecified emission reductions to a policy calling for reduced APU operating times for gates and other aircraft parking positions with pre-conditioned air and gate power. DEIR at p. 4.4-6. However, the DEIR does not identify the gates and “other aircraft parking positions” that would purportedly be affected by this policy, the duration of time the APU operating times would be reduced, nor the assumed emission reductions.

The DEIR’s lack of transparency as to how these policies and measures would reduce GHG emissions renders the DEIR’s emissions calculations meaningless.

**(d) The DEIR’s Failure to Estimate or Disclose the Project’s Operational Emissions Beyond 2028 Is a Serious Flaw.**

As with the approach taken with the document’s other environmental impact analyses, the DEIR fails to disclose any Project-related impacts after 2028. This omission—which as discussed above is closely related to the DEIR’s failure to consistently and accurately describe when Project “buildout” occurs—both deprives the public and decisionmakers of information necessary to a full understanding of the Project’s impacts, and divests the DEIR’s significance conclusions of evidentiary support.

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By truncating the analysis at 2028, the DEIR fails to reckon with the growth in aviation activity—and GHG emissions—that will undoubtedly occur as a result of the Project. The need for an objective analysis that extends beyond 2028 is not an academic exercise. Although the DEIR determines that the Project would result in a nominal increase in overall GHG emissions, it concludes that the Project would actually result in a *reduction* in aircraft-related GHG emissions. *See* DEIR at p. 4.4-30, Table 4.4-6. The DEIR attributes this decrease in aircraft emissions to the increased efficiency of the airfield with Project implementation. DEIR at p. 4.4-30. While the Project may improve airfield efficiency, and this increased efficiency *may* result in a reduction in GHG emissions over the short term, the increase in aviation activity that will result from the overall Project beyond 2028 would almost certainly result in a substantial increase in GHG emissions.

The DEIR evaluates the Project's emissions compared to 2018 Baseline Conditions and determines that there would be a 23% increase in aircraft emissions between 2018 and 2028. *See* DEIR at p. 4.4-29, Table 4.4-5. The DEIR explains that this increase in aircraft activity between 2018 and 2028 is projected to occur irrespective of the proposed Project. DEIR at p. 4.4-29. Yet, had the DEIR carried its analysis through the year 2045 (recognizing that aviation activity will increase to accommodate the 50 percent increase in passenger demand between 2018 and 2045) and analyzed the increase in GHG emissions that would accompany these increased activity levels, it would have determined that the Project would cause an increase, not a decrease in aircraft emissions.

Aircraft constitute a huge portion of an airport's emissions. According to a report prepared by the Center for Biological Diversity ("CBD"), aircraft carbon polluting is skyrocketing:

Greenhouse gas emissions from the aviation sector are a substantial contributor to global warming. If the aviation industry were a country, it would place sixth in emissions, between Japan and Germany. Left unchecked global aviation will generate an estimated 43 metric gigatons of carbon dioxide emissions through 2050, constituting almost 5% of the global emissions allowable to keep global warming below 1.5 degrees Celsius. In the United States, aircraft are one of the fastest-growing sources of emissions: Emissions from domestic aviation alone have increased 17% since 1990, to account for 9% of greenhouse gas emissions from the U.S. transportation sector. Flights departing from airports in the United States and its territories are responsible for almost one-quarter of global passenger transport-related carbon emissions, the majority of which come from

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domestic flights.

“Airplane Emissions,” Center for Biological Diversity.<sup>57</sup>

By omitting 27 years of emissions, the DEIR substantially underestimates the Project’s GHG emissions and thus fails to provide the public with a meaningful assessment of the Project’s impact on climate change.

The DEIR’s failure to analyze impacts beyond 2028 also makes it impossible to comprehensively evaluate the Project’s conflict with Executive Order S-3-05. EO S-3-05 establishes specific emissions reduction goals and guides state climate policy through 2050. The DEIR determines that the Project conflicts with the Executive Order, stating that GHG emissions in 2028 with Project implementation would be approximately 7.3% higher than baseline (2018) conditions. DEIR at p. 4.4-35. Yet, this is not the meaningful level of analysis CEQA requires. In order to provide a meaningful evaluation of the Project’s consistency with EO S-3-05, the DEIR must begin its analysis by estimating the Project’s emissions in 2050. We point out additional deficiencies in the DEIR’s analysis of consistency with EO S-3-05 below.

For the reasons discussed above, the DEIR should be revised to analyze impacts through at least 2050.<sup>58</sup>

**F. The DEIR Fails to Provide a Legally Defensible Analysis of the Project’s Conflicts with Applicable Plans, Policies, and Regulations Adopted for the Purpose of Reducing the GHG Emissions.**

**1. Executive Orders S-3-05, B-30-15, B-55-18, and the 2017 Climate Change Scoping Plan**

The DEIR determines that the Project would conflict with Executive Orders S-3-05, B-30-15, and B-55-18, and the 2017 Climate Change Scoping Plan. DEIR at p. 4.4-35. Yet, rather than provide a meaningful analysis which would allow decisionmakers and the public to understand the extent of these conflicts, the DEIR offers the following

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<sup>57</sup> Available at

[https://www.biologicaldiversity.org/programs/climate\\_law\\_institute/transportation\\_and\\_global\\_warming/airplane\\_emissions/](https://www.biologicaldiversity.org/programs/climate_law_institute/transportation_and_global_warming/airplane_emissions/); last accessed Feb. 9, 2021).

<sup>58</sup> Analyzing impacts through 2050 would also be closer to the guidance from the SCAQMD which identifies a project’s lifetime as 30 years. DEIR at p. 4.4-4.



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perfunctory explanation with regard to each of these directives: “GHG emissions in 2028 with Project implementation would be approximately 7.3 percent higher than baseline (2018) emissions.” *See* DEIR at p. 4.4-34, Table 4.4-7. There are several flaws with the DEIR’s purported impact analysis. First, the DEIR fails because it does not analyze the Project’s emissions through the target years established by these Executive Orders.<sup>59</sup>

Second, by simply proclaiming that the Project’s emissions would exceed baseline emissions, the Project fails to determine the severity and extent of the Project’s inconsistency with these state directives. Other agencies have adopted the Executive Orders as thresholds of significance for long-term projects, including Regional Transportation Plans. For example, in 2015 SANDAG used them as a threshold of significance in the EIR for its 2015 RTP/SCS. Specifically, that EIR asked whether the project would “[b]e inconsistent with the State’s ability to achieve the Executive Order B-30-15 and S-3-05 goals of reducing California’s greenhouse gas emissions to 40 percent below 1990 levels by 2030 and 80 percent below 1990 levels by 2050.” *See* Final Environmental Impact Report for San Diego Forward: The 2015 Regional Plan, adopted on October 9, 2015 at p. 4.8-19.<sup>60</sup>

In its RTP/SCS EIR, SANDAG evaluated the RTP/SCS’s impacts by calculating a 40 percent and 80 percent reduction from the region’s 1990 emissions and using those figures as a target reference point for the RTP/SCS. It then compared the region’s expected GHG emissions in the years 2035 and 2050 to the emissions necessary to meet the Executive Orders’ trajectories. It included charts showing that the RTP/SCS would not come close to meeting the Executive Orders’ goals. It concluded that because the total emissions in the San Diego region of 25.5 MMT CO<sub>2</sub>e in 2035 would exceed the regional 2035 GHG reduction reference point of 14.5 MMT CO<sub>2</sub>e (which is based on Executive Order-B-30-15 and Executive Order S-3-05), the RTP/SCS’s 2035 GHG emissions would be inconsistent with state’s ability to achieve the Executive Orders’ GHG reduction goals and that this inconsistency constituted a significant impact. It

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<sup>59</sup> Executive Order S-3-05 calls for reducing GHG emissions to 80 percent below 1990 levels by 2050; Executive Order B-30-15 establishes a statewide GHG reduction target of 40 percent below 1990 levels by 2030; Executive Order B-55-18 establishes a statewide GHG reduction target of carbon neutrality by 2045; and the 2017 Climate Change Scoping Plan sets a statewide strategy to achieve a statewide GHG reduction target of 40 percent below 1990 levels by 2030. DEIR at p. 4.4-35.

<sup>60</sup> Available at [https://sdforward.com/pdfs/EIR\\_Final/FinalEnvironmentalImpactReport-completedocument.pdf](https://sdforward.com/pdfs/EIR_Final/FinalEnvironmentalImpactReport-completedocument.pdf); last accessed Feb. 22, 2021.

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reached a similar conclusion for the year 2050 goal. By conducting this detailed analysis, SANDAG demonstrated it is feasible to conduct a meaningful analysis of a project's consistency with the state's directives adopted for the purpose of reducing GHG emissions. The ATMP DEIR should be revised to conduct an analysis that demonstrates the nature and extent of the Project's inconsistency with California's climate change goals.

Third, the DEIR attempts to dismiss its obligation to conduct a thorough analysis when it asserts that statewide GHG reduction targets are not directly applicable to individual projects. DEIR at p. 4.4-35. The DEIR includes no explanation as to why individual projects should be exempt from a consistency determination with state and GHG reduction plans. We query why the DEIR would set forth a significance threshold calling for this analysis, only to ignore it. Moreover, the CEQA Guidelines instruct the lead agency to determine "[t]he extent to which the project complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions." CEQA Guidelines § 15064.4 (b)(3). Finally, common sense dictates that individual projects—and especially large scale projects such as the ATMP—must be held accountable for their roles in achieving or interfering with GHG reduction goals.

The DEIR should be revised to provide a legally defensible analysis of the Project's consistency with regional and state plans adopted for the purpose of reducing GHG emissions.

## **2. SB 375 and SCAG's RTP/SCS**

The DEIR determines that the Project would not be inconsistent with SB375 and SCAG's 2020-2045 RTP/SCS suggesting that LAX's activity levels are within the activity levels identified for LAX in the 2020-2045 RTP/SCS. DEIR at p. 4.4-35. In particular, the DEIR claims that the activity levels are forecasted to be 127.9 MAP for LAX by 2045 whether or not the proposed Project is implemented. Here too, the DEIR has not provided the evidentiary support that the Project would not be inconsistent with the most recent RTP/SCS. Again, as an initial matter, the DEIR should have analyzed the ATMP's emissions in 2045, not just the activity levels projected for LAX in that year. In 2018, CARB issued per capita reduction targets for the SCAG region of 8% by 2020 and 19% by 2035. DEIR at pp. 4.4-16, 4.4-19. The DEIR should be revised to evaluate how the region will achieve these goals in light of the emission increases resulting from the ATMP.

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### 3. Sustainable City pLAn/Green New Deal

Los Angeles Mayor Eric Garcetti's Green New Deal is an ambitious update to the city's first-ever Sustainable City pLAn (2015).<sup>61</sup> The Green New Deal sets a commitment to the Paris Climate Agreement to drive down GHG emissions by placing Los Angeles on the road to a zero-carbon future. Specifically, the Green New Deal sets targets of reducing municipal GHG emissions below 2008 levels by 55% by 2025 and 65% by 2035, reaching carbon neutrality by 2045. *Id.*

The DEIR determines that the Project would be inconsistent with the Sustainable City pLAn and the Green New Deal (DEIR at p. 4.4-36), but similar to the approach taken within regard to the Executive Orders, it does not evaluate the severity and extent of these inconsistencies. The EIR should be revised to include a detailed evaluation of the Project's inconsistencies with these important plans.

### 4. LAWA Sustainability Plans and Guidelines

LAWA's Sustainability Plans and Guidelines identify an internal commitment to reduce GHG emissions from LAWA owned and operated sources 45% below 1990 levels by 2025, 60% by 2035, and 80% by 2050. LAWA's Sustainability Action Plan ("SAP") increases these goals to a 55% reduction below 1990 levels by 2025, 65% reduction by 2035, and carbon neutrality by 2045. DEIR at p. 4.4-37. The DEIR determines that the Project would not be inconsistent with these Plans and Guidelines because the Project would achieve LEED Silver certification, the airfield improvements would meet LAWA's Sustainable Design Requirements and because Terminal 9 and Concourse 0 would have pre-conditioned air and gate power. *Id.* The DEIR lacks the evidentiary basis to conclude the Project would not be inconsistent with LAWA's Plans because it makes no attempt to determine whether the Project would be consistent with the airport's Sustainability Action Plan's emission reduction goals. Moreover, as discussed above, the DEIR lacks evidentiary support that the Project would meet the LEED Silver standard.

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<sup>61</sup> Mayor Garcetti's Green New Deal (available at [https://plan.lamayor.org/sites/default/files/pLAn\\_2019\\_final.pdf](https://plan.lamayor.org/sites/default/files/pLAn_2019_final.pdf); last accessed Feb. 9, 2021).

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**G. The DEIR's GHG Mitigation Measures Fail to Satisfy CEQA's Standards.**

**1. The Measures Discussed in the DEIR Are Impermissibly Vague and Unenforceable.**

The DEIR relies on many of the same mitigation measures to purportedly mitigate the Project's air quality and GHG significant impacts. Set forth below is a summary of the deficiencies with the DEIR's approach to measures intended specifically to address the Project's significant GHG emissions.

MM-GHG (ATMP)-3 calls for LAWA to develop and adopt an airport-wide Green Procurement Policy which "shall identify requirements and standards for products or services that have a lesser or reduced effect on human health and the environment when compared with competing products or services that serve the same purpose." DEIR at p. 4.4-32. This measure is vague and non-specific and therefore fails to commit LAWA to specific, enforceable actions that will reduce or avoid Project emissions to the extent feasible. As discussed above, CEQA allows mitigation to be deferred but only if there is a reason or basis for the deferral and the measures contain specific performance standards that will be met. *San Joaquin Raptor Rescue Ctr. v. County of Merced* (2007) 149 Cal.App.4th 645, 669-71. Here, the DEIR contains no rationale for why it is necessary to defer the development of this green policy, nor does it include any performance standards. In addition, the DEIR makes no attempt to correlate the Green Procurement Policy to GHG emission reductions.

MM-GHG (ATMP)-4 has the potential for substantial emission reductions yet the measure is vague and directory. It calls for enhancing LAWA's existing recycling program but it does not describe the agency's existing program nor does it describe how the program would be expanded. *See* DEIR at p. 4.4-32 (merely calling for an expansion of the number of facilities in the program). Similarly the measure calls for updating the agreement requiring tenant diversion goals, but it does not describe the existing tenant diversion goals or explain how these goals would be updated. Relatedly, MM-GHG (ATMP)-2 calls for LAWA to require "waste reduction procedures" at Concourse 0 and Terminal 9. DEIR at p. 4.4-32. Here too, the DEIR does not describe LAWA's Waste Collection Program, other than to state that it is a voluntary program. *Id.*

Both MM-GHG (ATMP)-2 and MM-GHG (ATMP)-4 would appear to have tremendous potential to reduce GHG emissions (and divert a substantial amount of landfill waste), but in order to achieve emission reductions, the measures must be

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significantly strengthened. LAWA should follow the lead of San Francisco International Airport (“SFO”) and adopt a Zero Waste Plan that requires SFO to reduce or eliminate the use of non-renewable materials and to recycle or compost all eligible materials. SFO Zero Waste Plan: A roadmap to reduce, recapture, recycle and reinvent SFO’s Material System.<sup>62</sup> The goals of SFO’s Zero Waste Plan is to divert at least 90% of waste from landfills and incinerators by 2021. SFO’s program has the potential to be very successful. In Fiscal Year 2015-16, SFO generated 12,200 tons, or 26,888,800 pounds, of solid waste. A recent study confirmed that more than 95% of this waste was compostable or recyclable. *Id.*

## 2. Additional Potentially Feasible Mitigation Must Be Considered.

The DEIR acknowledges that the Project’s increase in GHG emissions would result in significant impacts, even with mitigation. Similar to the approach taken with respect to the air quality mitigation measures, the DEIR states that LAWA compiled and reviewed a broad array of potential measures that could reduce the Project’s GHG emissions. The DEIR refers the reader to DEIR Appendix C.9, explaining that certain of these measures are already being implemented at LAX or would be implemented as part of the ATMP as Project features. Of the remaining measures, some were considered feasible to add as mitigation measures while others were determined to be infeasible. DEIR at p. 4.4-33. A review of these additional measures reveals that LAWA likely has the authority to implement measures that it has determined to be infeasible.

For example, Measure #32 calls for the creation of a carbon offset strategy. DEIR, Appendix C at p. C.9-6. The DEIR asserts that the FAA has taken the position that any use of funds by LAWA absent a specific regulatory requirement is prohibited by revenue diversion policies (*id.*) yet the DEIR does not explain the nature of this prohibition. The DEIR refers to an FAA policy which apparently pertains to the use of airport revenues but the document does not describe this policy nor does it explain how the policy would prohibit LAWA from creating a carbon offset policy. In addition, the DEIR does not explain why LAWA could not simply adopt a regulation calling for the establishment of a carbon offset program.

Measure #34 calls for LAWA to develop an airport expansion and development GHG emission policy. *See* DEIR, Appendix C at p. C.9-6). The DEIR refers to this measure as an “Existing Program” yet it also states that LAWA does “not currently have

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<sup>62</sup> Available at [https://www.flysfo.com/sites/default/files/media/sfo/community-environment/13259\\_Zero\\_Waste\\_Roadmap.pdf](https://www.flysfo.com/sites/default/files/media/sfo/community-environment/13259_Zero_Waste_Roadmap.pdf); last accessed Feb. 9, 2021.

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a formal, adopted policy specific to greenhouse gas emissions but that it does have several other programs and requirements that serve to reduce or minimize greenhouse gas emissions within its control.” *Id.* Given that GHG emissions from the aviation sector are a substantial contributor to climate change, we query why LAWA cannot adopt a policy or program specific to GHG emissions. A cornerstone of such a program could be an emission offsets program.

Notwithstanding the mitigation measures identified in the DEIR, the Project’s GHG impacts remain significant and unavoidable. LAWA has a duty to consider other feasible mitigation measures as it may not lawfully approve the Project without considering additional, feasible mitigation to reduce or avoid the Project’s significant climate change impacts.

**H. LAWA Must Look Out at Least 20 Years and Submit a Master Plan Amendment to the ALUC for Consistency Review.**

In describing the role of Airport Land Use Commissions, California Public Utilities Code section 21675(a) provides, in relevant part: “The commission’s airport land use compatibility plan shall include and shall be based on a long-range master plan or an airport layout plan, as determined by the Division of Aeronautics of the Department of Transportation, that reflects the anticipated growth of the airport during at least the next 20 years.” California Public Utilities Code section 21676(c) provides, in relevant part: “Each public agency owning any airport within the boundaries of an airport land use compatibility plan shall, prior to modification of its airport master plan, refer any proposed change to the airport land use commission.”

The DEIR briefly discusses the project’s consistency with the LA County Airport Land Use Plan (DEIR at p. 4.6-5) and acknowledges that the Project must be presented to the ALUC for a determination regarding whether the project is consistent with the LA County Airport Land Use Plan (DEIR at p. 2-86). The DEIR does not, however, acknowledge or comply with LAWA’s obligation to update its long-range Master Plan for LAX to reflect anticipated growth of the airport during at least the next 20 years.

In the years since adoption of the 2004 Master Plan for LAX, that plan has become increasingly irrelevant, as LAWA has abandoned many Master Plan elements and modified others through the pursuit of various stand-alone projects. LAX is long overdue for a Master Plan update. Rather than preparing a comprehensive Master Plan update, however, LAWA has adopted a piecemeal approach to airport planning similar to that seen in the era before the 2004 Master Plan. The Project is just the latest example of this

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approach. In the absence of a complete Master Plan, the public and ALUC cannot understand the full extent of likely growth at LAX. Moreover, by failing to look out at least 20 years, LAWA violates both state law regarding ALUC review and CEQA.<sup>63</sup>

**I. The DEIR Fails to Adequately Analyze and Mitigate the Project’s Energy Impacts.**

An EIR must include a “detailed statement” setting forth, among other things, “measures to reduce the wasteful, inefficient, and unnecessary consumption of energy.” Pub. Resources Code § 21100(b)(3). Appendix F to the CEQA Guidelines contains a “list of energy impact possibilities and potential conservation measures” that lead agencies should consider if “applicable or relevant” to the project for which an EIR is prepared. CEQA Guidelines, App. F, § II. EIRs must quantify the energy impacts of proposed projects, and must consider specific measures to reduce those impacts. *California Clean Energy Committee v. City of Woodland* (2014) 225 Cal.App.4th 173, 211-212; *Ukiah Citizens for Safety First v. City of Ukiah* (2016) 248 Cal.App.4th 256, 264-65.

The DEIR’s discussion of operational energy impacts is flawed. As previously discussed, the DEIR’s assertion that aviation activity at the airport would grow at exactly the same rate with or without the Project is misleading. Accommodating additional growth in air travel by removing existing constraints will foreseeably lead to greater aviation fuel consumption, which must be addressed in the DEIR. Because the DEIR fails to account for all aviation fuel usage caused by the Project, or to propose mitigation for this potentially significant impact, it fails to comply with Appendix F. *See California Clean Energy Committee*, 225 Cal.App.4th at 212.

**J. The DEIR Fails to Properly Analyze or Mitigate the Project’s Hazards to the Public and the Environment.**

An EIR must analyze whether a project would create a significant hazard to the public or the environment from the routine transport, use or disposal of hazardous materials or from reasonably foreseeable upset and accident conditions involving the

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<sup>63</sup> Moreover, LAWA’s piecemeal approach creates costly project coordination problems. Even LAWA seemed to acknowledge the problem with that approach in its recent RFP for a “Principal Engineer/Architect” team to “advance the planning and design” of the Project, which sought applicants with significant airport master planning experience. *See* Exhibit 2, BOAC Dec. 10, 2020 Agenda Item 14 Staff Report.

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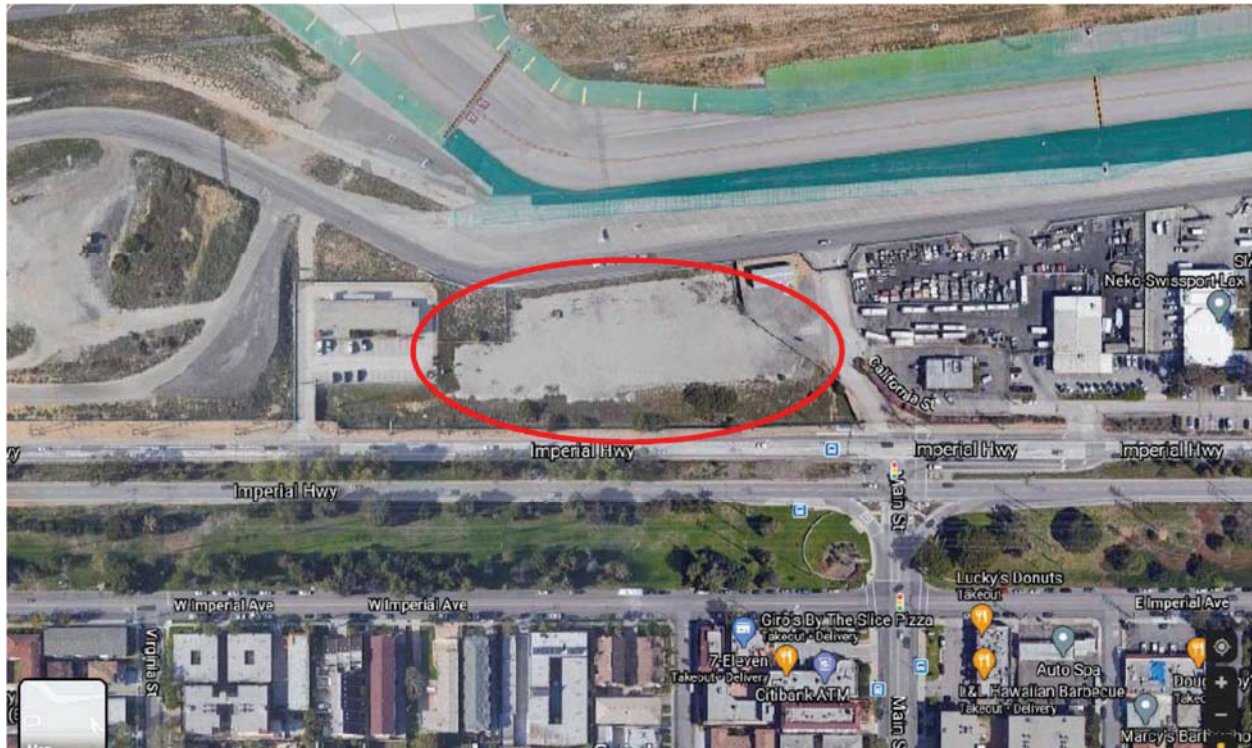
release of hazardous materials. *See* CEQA Guidelines, Appendix G.IX. Here, the Project would increase the risk of hazards to the surrounding community by relocating undisclosed “hazardous materials” from their current location in Air Freight Building No. 8, to a new, undisclosed location on the LAX premises, potentially in close proximity to residential areas and sensitive receptors.

The DEIR states that due to the construction of proposed Terminal 9, LAWA would have to demolish and relocate a portion of Air Freight Building No. 8 to a new, undisclosed site on the airport. DEIR, Table 2-4, row 28. Currently, the 70,891-square-foot building and adjacent area is used by various tenants for cargo operations, GSE support, hazardous materials storage, and aircraft/maintenance/overhaul support. *Id.* Construction of Terminal 9 would require relocating at least 15,000 square feet of the current site to a new location or consolidating the affected uses in the remaining structure. *Id.* However, LAWA does not indicate any potential site where the building/uses would be relocated. Nor does the DEIR disclose what these hazardous materials are or the risk they pose to nearby communities. The failure to include any of this information in the DEIR, even if the ultimate relocation site is not yet known, violates CEQA.

Furthermore, El Segundo has serious concerns that LAWA would relocate these uses to an empty site adjacent to El Segundo residences. Although the DEIR discusses the proposed demolition/relocation of Air Freight Building No. 8 as an “enabling project” for Terminal 9, it is clear that this would be specifically for the proposed Taxiway C extension (*see* Part III). When LAWA previously proposed the Taxiway C extension in 2012, LAWA stated that some or all of Air Freight Building No. 8 would have to be demolished/relocated. LAWA proposed relocating the affected uses to a site directly across Imperial Highway from El Segundo (*see* aerial photo below).



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LAWA may not relocate any of the current uses at Air Freight Building No. 8, including but not limited to hazardous materials storage, to any site adjacent to El Segundo without disclosing this plan to the public or conducting an environmental review of this relocation. As things stand now, LAWA cannot rely on the DEIR for *any* relocation of the building/uses. Under CEQA, LAWA must evaluate all environmental impacts of moving some or all of Air Freight Building No. 8 to a new site/existing facility, and any potential alternative sites/facilities, including but not limited to noise, light, hazardous materials, and transportation impacts caused by an intensification of existing use. El Segundo moreover urges LAWA not to propose or approve relocating these uses to the aforementioned site, or any other site adjacent to El Segundo.<sup>64</sup>

<sup>64</sup> Furthermore, with the exception of the proposed Southwest Airlines GSE facility relocation (DEIR, Table 2-4, row 7), LAWA has not done any of the CEQA analysis that would be needed to support locating *any* facilities as part of the Project to sites along Imperial west of Sepulveda. LAWA cannot rely on the DEIR for any such relocation. With regard to the proposed Southwest Airlines GSE relocation, El Segundo requests that (footnote continued on next page)

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**K. The DEIR Fails to Adequately Analyze and Mitigate the Project's Aesthetic Impacts.**

LAWA does not evaluate the Project's impacts on aesthetics in the DEIR, based on its conclusion in the NOP that there would be no such impacts. *See* DEIR at p. 6-7. Nonetheless, we take this opportunity to convey El Segundo's frustration with the poor aesthetic quality of LAWA's property on LAX's southern boundary, adjacent to El Segundo.

These photos of the existing street view along Imperial Highway and California Street between LAX and El Segundo illustrate the poor aesthetic quality of airport property on the southern boundary:



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LAWA commit *not* to select "Option 1" or "Option 2" for the proposed relocation of the GSE facility, as shown at DEIR Figure 2-27.

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These aesthetic/landscape conditions are far inferior to what LAWA maintains at other locations around the airport and do not satisfy LAWA’s own prior commitments with respect to landscaping and aesthetics.

For example, these excerpts from LAWA’s MMRP for the LAX Master Plan illustrate LAWA’s longstanding promise to provide landscaping and other aesthetic improvements in order to be a better neighbor to El Segundo and others. LAWA has not lived up to those promises, but must make that a priority now before investing in new facilities, including the Project.

**LAX MASTER PLAN ALTERNATIVE D  
 MITIGATION MONITORING & REPORTING PROGRAM**

| Master Plan Commitments/<br>Mitigation Measures                | Potential Impact<br>Being Addressed  | Timing of<br>Implementation   | Monitoring<br>Frequency  | Actions Indicating<br>Compliance                       |   |
|--|--|-------------------------------|--|--|---|
| <i>Design, Art, and Architecture Applications / Aesthetics</i> |  |                               |  |  |   |
| DA-1<br><br>Monitoring Agency:<br>LAWA                         | <b>Provide and Maintain Airport Buffer Areas.</b> Along the northerly and southerly boundary areas of the airport, LAWA will provide and maintain landscaped buffer areas that will include setbacks, landscaping, screening or other appropriate view-sensitive improvements with the goals of avoiding land use conflicts, shielding lighting, enhancing privacy and better screening views of airport facilities from adjacent residential uses. Use of existing facilities in buffer areas may continue as required until LAWA can develop alternative facilities. | Avoidance of view degradation | Prior to approval of development plans for projects abutting residential and view sensitive uses along the northern & southern boundaries of airport by LAWA | Once, during plan review on a project-by-project basis | Provision of landscape buffer areas, to the extent feasible, in the development and landscape plans |

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|  |   |   |                                    |   |   |
|--|---|---|------------------------------------|---|---|
| LU-4<br><br>Monitoring Agency:<br>LAWA | <b>Neighborhood Compatibility Program.</b> Ongoing coordination and planning will be undertaken by LAWA to ensure that the airport is as compatible as possible with surrounding properties and neighborhoods. Measures to enforce this policy will include: 1) Along the northerly and southerly boundary areas of the airport, LAWA will provide and maintain landscaped buffer areas that will include setbacks, landscaping, screening or other appropriate view sensitive uses with the goal of avoiding land use conflicts, shielding lighting, enhancing privacy and better screening views of airport facilities from adjacent residential uses. Use of existing facilities in buffer areas may continue as required until LAWA can develop alternative facilities. 2) Locate airport uses and activities | Land use incompatibility with nearby residential uses | Throughout Master Plan development | On-going throughout Master Plan development | Compliance with the provisions of the LAX Zone/LAX Specific Plan and LAX Plan |
|--|---|---|------------------------------------|---|---|

Area: Land Use

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**LAX MASTER PLAN ALTERNATIVE D  
 MITIGATION MONITORING & REPORTING PROGRAM**

|      | Master Plan Commitments/<br>Mitigation Measures  | Potential Impact<br>Being Addressed | Timing of<br>Implementation | Monitoring<br>Frequency | Actions Indicating<br>Compliance |
|------|--|-------------------------------------|-----------------------------|-------------------------|----------------------------------|
| LU-4 | (Cont'd)<br>with the potential to adversely affect nearby residential land uses through noise, light spill-over, odor, vibration and other consequences of airport operations and development as far from adjacent residential neighborhoods as feasible. 3) Provide community outreach efforts to property owners and occupants when new development on airport property is in proximity to and could potentially affect nearby residential uses. |                                     |                             |                         |                                  |

LAWA must rectify this existing problem by immediately developing and implementing adequate landscaping plans for its southern boundary, adjacent to El Segundo.

**VI. The DEIR Must Be Revised and Recirculated to Meet CEQA’s Requirements of Adequate Disclosure of Impacts and Adequate Opportunity for Public Review.**

The environmental impacts of LAX and the proposed Project are massive. The plans for the airport’s future should undergo detailed and accurate review, including full disclosure to the public and decisionmakers and an opportunity to for the public to comment and be heard. For the reasons detailed in this letter and the attachments/exhibits, the DEIR fails to provide adequate disclosure and mitigation of significant environmental impacts. Additional analysis must be prepared to meet legal standards and adequate documents must be recirculated to the public for review and comment.

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**Conclusion**

For the reasons set forth above, we respectfully request that no further consideration be given to the proposed Project until an EIR is prepared and circulated that fully complies with CEQA.

On behalf of El Segundo, thank you for the opportunity to comment on the DEIR.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Joseph "Seph" Petta  
Osa L. Wolff  
Benjamin Gonzalez  
Laurel L. Impett

cc:

Drew Boyles, Mayor  
Chris Pimentel, Mayor Pro Tem  
Carol Pirsztuk, Councilmember  
Scot Nicol, Councilmember  
Lance Giroux, Councilmember  
Scott Mitnick, City Manager

Attachments:

- Attachment A: Kanafani Report, February 8, 2021  
Professor Adib Kanafani, Ph.D., N.A.E.
- Attachment B: Svinth Report, January 7, 2021  
Fred M. Svinth, INCE, Assoc. AIA  
Illingworth & Rodkin, Inc.
- Attachment C: Liddicoat Report, January 14, 2021  
Neal Liddicoat, P.E.  
Griffin Cove Transportation Consulting

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Attachment D: Tamura Report, January 21, 2021  
Todd Tamura, QEP  
Tamura Environmental

Exhibits:

- 1 November 24, 2020, December 22, 2020 and February 1, 2021 California Public Records Act Requests from El Segundo to LAWA
- 2 BOAC December 10, 2020 Agenda Item 14 Staff Report
- 3 Analysis of 2019 Q1 and Q2 Quarterly Noise Reports
- 4 El Segundo comments on Ricondo MSC South Memo
- 5 BOAC August 1, 2019 Agenda Staff Report for Item 15
- 6 Ricondo MSC South Memo
- 7 June 5, 2018 NASIP Technical Analyses
- 8 August 29, 2018 NASIP Briefing
- 9 June 19, 2019 Southwest Airlines LAX Network Plan
- 10 Southwest Airlines Terminal 1 East CDO & TDIP DED Briefing (Jan. 15, 2020)
- 11 2016 Kanafani Comments on LAMP Ground Access
- 12 2016-2040 RTP/SCS Aviation & Airport Ground Access Appendix
- 13 January 29, 2015 Runway Shift Study PowerPoint
- 14 March 2015 Runway Shift Study Final Report
- 15 June 14, 2018 NASIP Update
- 16 October 18, 2018 Letter to LAWA re El Segundo RSI Program Termination
- 17 November 14, 2018 Letter to FAA re El Segundo RSI Program Termination
- 18 September 18, 2020 Letter to LAWA re Compliance with Stipulated Variance
- 19 October 1, 2020 Letter from LAWA to El Segundo re Variance Compliance Plan
- 20 February 5, 2021 Letter to LAWA re Compliance with Stipulated Variance
- 21 2020 LAX Stipulated Variance
- 22 City of El Segundo General Plan Circulation Element Exhibit C-7

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**ATTACHMENT A**



## Comments on the DRAFT DEIR of the LAX Airfield and Terminal Modernization Project

A Kanafani  
February 8, 2021

### Introduction

This review of the DEIR for the LAX Airfield and Terminal Modernization Project focuses on the analysis of traffic growth forecast and its relation to the airfield and gate system improvements in the project. While no attempt is made to question the socioeconomic assumptions underlying the overall demand forecasts, it should be noted that these forecasts were made prior to the onset of the current pandemic. While recovery in the aviation system is not unknown and recognized in the preamble to the DEIR, the long-term effects of this pandemic on the behavior of the aviation system and on the socioeconomic factors driving aviation demand are not well understood yet. Some of the changes being witnessed today in work habits, commerce and social activities may become long lasting if not permanent. These changes will likely alter the relation between factors such as GDP growth and air travel demand. Likewise, recent changes in airlines fleets, such as the accelerated retirement of very large aircraft will alter the relation between aircraft operations forecast and passenger traffic forecasts, and relation between airfield and landside operational capacities. These recent changes are not reflected in what is essentially a post-pandemic forecast. This review is therefore only focusing on the consistency of the analysis within the assumptions of its forecasts as documented in the DEIR, and in particular on the possible impact of the improvements in this project on growth in aircraft operations and in passenger traffic.

The review finds that the DEIR does not adequately assess the traffic growth impacts caused by the improvements in question.

### Traffic Forecasting Issues

The project is based on forecasts of traffic at LAX with an unconstrained and a constrained growth scenario. The unconstrained forecast is based on socioeconomic projections for the LA Basin and projects compound annualized growth rates (CAGR) of 2.2% for passengers and 1.1% for aircraft operations. This projection is based on an assumed 80% share for LAX of the basin's total traffic. The constrained forecast is based on the assumption that as airport capacity is approached, as reflected by annualized average delay reaching 15 minute per operation, growth will slow down to defer the onset of delays in such a way that annualized average delay reaches 18 minutes by 2045. The constrained forecast results in CAGR growth rates of 1.5% for passengers and 0.7% for operations. [see Appendix B.1, Exhibit 4-2] In both scenarios, the faster growth of passenger traffic compared to operations reflects assumed changes in aircraft fleets, primarily through the increases in seating capacities of aircraft such as B737's and A320's. These increases are evidenced by recent airline aircraft orders documented in the DEIR.

The slowdown in traffic growth in the constrained forecast is assumed to begin in 2029. This assumption is based on the results of capacity simulations that show the capacity of 833,000 annual operations to be reached in 2031, and the assumption that airlines begin to adjust their schedules and fleet choices and to reduce operations approximately 2 years before the onset of the 15-minute delay that defines capacity. Constrained growth is assumed to continue in such a way that the annual average delay reaches 18 minutes in 2045 with 853,000 annual operations.

This total operations forecast for 2045 is then converted to passenger traffic (MAP) using the three operational assumptions based on observed trends at the airport, as described in section 4.4.4 of Appendix B:

1. Percent of operations that are scheduled passenger service = 90%
2. Average Load Factor = 90%
3. Average seats per departure = 190

The resulting constrained MAP forecast shown in Table 4.1 of Appendix B does not reflect these assumptions correctly. For example, the Table 4.1 estimates passenger traffic in 2045 at 127.9 MAP, when the correct number with the stated assumptions should be 131 MAP.  $(853,000 \times 0.9 \times 0.9 \times 190 = 131,000,000)$ . Furthermore, it is curious that the DEIR assumes an average 190 seats per departure in 2045 under the constrained scenario while using the figure of 204 under the unconstrained scenario [as shown in Table 3.6]. If the constrained scenario reflects the airlines' response to increased delays by increasing seating densities and load factors, then the average seats per departure would be higher than under the unconstrained conditions.

All this casts doubt about the validity of the forecast numbers and requires correction, and a clarification of the assumptions used about the relation between flight operations and passenger traffic forecasts.

However, the major flaw in the DEIR is that it assumes implicitly that the evolution of delays is unaffected by the proposed improvements. It assumes that average annual delay will reach 15 minutes in 2031 regardless of the improvements in the project. As shown in the operations analysis discussed in the following paragraphs, the proposed improvements are estimated to result in a reduction in average delay [See Appendix B.2 Exhibit 3-2], which means the ability of the airport to handle additional traffic before the onset of the 15-minute average and the start of the constrained growth. This means more traffic with the improvements than without, whether in 2028, 2035 or 2045.

Therefore, the DEIR fails to assess the effect of the improvements on traffic growth and on the resulting environmental impact of this growth. The analysis in the forecasting section of the DEIR should be performed with and without the ATMP in order to correctly assess the impact of the improvements on traffic growth.

## Operational and Capacity Issues

The DEIR adopts the industry standard approach of defining capacity in terms of delay. Capacity is assumed to be reached when a particular level of “tolerable delay” is reached. In the DEIR the annualized average delay of 15 minutes per operation is adopted as the standard, although for determining the long-term constrained forecast traffic 18 minutes was assumed to be reached in 2045. The industry standard simulation model, SIMMOD, is used to calculate delay given a set of assumptions about the operational characteristics (runway operations, fleet mixes, gate assignments, weather conditions, etc.).

The improvements in this project include the improvement of exit taxiways on runway 6L/24R with the reconfiguration of 2 existing exit taxiways and the addition of 2 new high-speed exit taxiways and the improvements of taxiways D and C.<sup>1</sup> These improvements, by streamlining the exit process in both directions on runway 6L/24R will reduce runway occupancy time and increase the throughput, or capacity of the runway.

As shown in Appendix B.2 of the DEIR, this SIMMOD simulation was run for the years 2018 and 2028, but not beyond. It was used to estimate the annualized annual average delay per operation with and without the improvements. The results show a reduction of annualized total average delays of 0.5 minutes per operation in 2018 and 1.3 minutes per operation in 2028. [see Tables 3-2 and 3-3 and Exhibit 3-2].

Thus, the analysis clearly demonstrates that by reducing delays the capacity of the airfield, which is the limiting capacity of the airport, is increased by the proposed improvements. As mentioned earlier, this increase in capacity has not been taken into account in the estimation of impacts of the improvements on traffic growth and on the development of the constrained traffic forecast.

The analysis shown in the DEIR and reported in Exhibit 3-2 fails to adequately assess the impact of the improvements on airport capacity and on traffic growth for two reasons.

First, given the exponential nature of delay growth with increasing traffic as acknowledged earlier in the DEIR, the 1.3 minutes savings per operation in 2028, which may seem to be too small to have an impact on traffic growth, would increase rapidly past 2028 resulting in a significant impact from the improvements. By limiting the analysis to 2028, the DEIR fails to assess these savings due to the project and their impact on traffic growth.

Second, the detailed results of the simulation [Tables 3-2 and 3-3] show wide variations in delay around the annualized total average delay for the various operational conditions and around the average savings from the project. Thus, while the savings in the overall average

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<sup>1</sup> The improvement of taxiway C is not identified explicitly as an input into the simulation modeling, and may have been included under “...and other taxiway and taxi-lane improvements”. This needs to be clarified. It should be noted that the DEIR incorrectly labels the proposed extension of Taxiway C as a “Terminal Area Element” rather than an “Airfield Element.” [See DEIR at p. 2-28] LAWA previously proposed the Taxiway C extension in 2013 associated with improvements to the Runway 7L/25R Runway Safety Area (RSA), but ultimately did not approve the taxiway extension.

delay are 1.3 minutes per operations, savings for some of the operating configurations are far more significant. For example, under West IFR operations the average delay drops due to the improvements from 42.9 to 35.2 or 7.7 minutes per operation. For East MVFR conditions the delay drops due to the improvements from 64.2 to 19.5 or 44.7 minutes per operation. Such gains are significant and are masked when using only the annualized total average. This is especially serious since as the DEIR correctly recognizes, airlines adjust their schedules to adapt to large increases in delay. These large variations in delay savings due to the project will be even more significant when the analysis is carried beyond 2028.

## Summary and Recommendation

The DEIR for the LAX ATMP project incorrectly ignores the traffic growth effects of the project. It incorrectly ignores the fact that capacity improvements, as reflected by reduced delays with the project, will result in faster traffic growth than without it. Since, as the DEIR indicated, the capacity of the runway system is the limiting capacity of the airport, the increase in the number of gates with this Project to 177 and the resulting expansion of the terminal system capacity makes little business sense, were it not for the runway capacity increases expected from this Project.

The DEIR should clarify the forecast assumptions used in projecting flight operations and passenger traffic under the constrained and unconstrained scenarios and correct any calculation errors in these forecasts.

The DEIR should extend the traffic modeling analysis to quantify the effect of the project improvements on airport delays and consequently on traffic growth. The SIMMOD model simulations should be conducted with and without the project, and extended beyond 2028. The results of the model should be carefully analyzed to take into consideration potential large delay savings during specific operational conditions and their potential impact on traffic growth.

1336795.1

**Adib Kanafani**

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Edward G. and John R. Cahill Professor of Civil Engineering Emeritus

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Professor Kanafani obtained his Ph.D. in Transportation Engineering from the University of California at Berkeley in 1969. Since joining the faculty at Berkeley in 1970 he has taught and conducted research on transportation systems, transportation engineering, airport planning and design, and air transportation economics. He has served on a number of national and international advisory panels to Government and industry. He served as Chairman of the Department of Civil and Environmental Engineering at Berkeley, as Director of Berkeley's Institute of Transportation Studies, and as Founding Co-Director of the National Center of Excellence in Aviation Operations Research, a University/Industry partnership funded by the Federal Aviation Administration and headquartered at Berkeley.

Kanafani's important contribution to air transportation include air transportation demand analysis, airport capacity analysis methods, and airline network analysis. His research on airline hubbing and on the relation between aircraft technology and airline network structure laid the ground for much of the work aimed at understanding the implications of airline deregulation in the late 1970's. He was a member of the research team that developed airport capacity analysis methods that are in widespread application in airport planning and design.

As Director of Berkeley's Institute of Transportation Studies from 1983 to 1998 he played an important role in establishing the Intelligent Transportation Systems research effort in the U.S. and was a founding member of Mobility 2000, the precursor organization to today's national program in ITS. He also founded the PATH program at the Institute of Transportation Studies, a program that has evolved to become the premier academic research program in ITS. In this area, he made contributions to the study of the economics of traffic information and to the impact of advanced traffic information systems on urban traffic patterns. He also made contributions to the emerging field of computer aided transportation planning.

Professor Kanafani has authored over 170 publications on transportation, including a book on Transportation Demand Analysis, and one on National Transportation Planning. He has graduated about 40 doctoral students who are making their mark on the profession in academia, government, and industry. He is a recipient of numerous awards including the American Society of Civil Engineers' Walter Huber Research Prize in 1982, and Horonjeff Award in 1988, and the James Laurie Prize in

2000. He was elected to the National Academy of Engineering in 2002, and was designated a Life-time Affiliate of the National Academies in 2004. He was elected to the Academy of Distinguished Alumni of Berkeley's Civil and Environmental Engineering Department in 2012 and served as member of its Founding Board of Directors.

Kanafani has served on a number of study panels of the National Academy of Engineering dealing with airport capacity, air transportation safety, and the effects of airline deregulation. He advises many agencies, in industry and Governments on transportation issues and has participated in the planning and design of a number of airports around the world. He has a long and distinguished record of service to professional societies, including the American Society of Civil Engineers, where he served as Chairman of the Air Transport Division; and the Transportation Research Board (TRB) of the National Research Council, where he served as Chairman of the Executive Committee.

**ATTACHMENT B**

**ILLINGWORTH & RODKIN, INC.**  
**Acoustics • Air Quality**

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January 7, 2021

Mr. Joseph D. Petta, Attorney  
Shute, Mihaly & Weinberger LLP  
396 Hayes Street  
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**Via email: Joseph D. Petta ([petta@smwlaw.com](mailto:petta@smwlaw.com))**  
**CC: Laurel L. Impett ([Impett@smwlaw.com](mailto:Impett@smwlaw.com))**

**Subject: LAX Airfield and Terminal Modernization Project**  
**Draft EIR Noise Comments**

Dear Mr. Petta:

Following is Illingworth & Rodkin, Inc's (I&R) review of the Noise Sections and the Appendix F Noise Report contained in the LAX Airfield and Terminal Modernization Project Draft Environmental Impact Report (DEIR) with respect to environmental noise issues.

#### **Section 4.7.1 (Aircraft Noise)**

##### Typical Ambient noise levels

The Community Noise Equivalent Level (CNEL) discussion in section 4.7.1.1.2 reports the typical outdoor noise levels for developments adjacent to major freeways at 85 dBA CNEL, a level which I&R considers quite high. In discussions of typical environmental noise levels, I&R and others commonly considers noise levels of 75-80 dBA to be normal at the first row of developments outside a freeway right-of-way<sup>1,2</sup>. Overstating typical levels may result in the high noise project operational noise levels being interpreted as being a normal condition and thus understate the relative impact of project generated noise on surrounding uses.

##### Sleep Disturbance, Physiological Response and Annoyance Discussions

Section 4.7.1.1.3 of the DEIR includes a fairly extensive discussion of the effects of noise on sleep disturbance, physiological response and annoyance with the effect of maximum noise and single event levels on these subjects presented in each case. However, following these discussions, the DEIR concludes that, since there is a debate in the scientific community and/or definitive correlations to how these effects are related to environmental noise, and that there is no established regulatory criteria specific to these noise effects, the evaluation of noise impacts in terms of appropriate event based noise metrics ( $L_{max}$ , SEL, or TA noise metrics) can be ignored.

The text further posits that the nighttime and evening noise penalties in the time averaged CNEL noise metric, which accounts for the increased sensitivity to noise events happening during hours when most sleep occurs, make the use of this metric acceptable for use in evaluating sleep disturbance and residential awakenings. While average day/night noise metrics such as the CNEL

<sup>1</sup> Corbisier, Chris, "Living with Noise", Federal Highway Administration Research and Technology, <https://www.fhwa.dot.gov/publications/publicroads/03jul/06.cfm>

<sup>2</sup> Noise Elements of Alameda County (Eden Area), Marin County, City of San Jose, and the City of Berkeley.



are useful in evaluating noise and land use compatibility on a programmatic basis, in I&R's experience the actual (project level) impacts of loud events, which is the dominant noise produced by aircraft operations, are generally experienced by community members on an event and not on an average basis (e. g. individuals typically experience loud distinct events on a per event basis not as an overall average level over time).

Whereas it is true that there are no established noise regulatory criteria specific to sleep disturbance, annoyance, and other physiological responses and that there is debate in regarding the relationship between aircraft noise and these subjects, as noted on pages 4.7.1-12 to 4.7.1-13, there are documented correlations between aircraft event noise and significant sleep disturbance, physiological response and annoyance. Therefore, it would follow that the fully evaluate the effect of aircraft noise due the project, the DEIR should present and discuss aircraft event based noise data such as the  $L_{max}$ , SEL, and TA noise metrics.

Intermittent and impulsive noises, such as aircraft overflights, have been found to be more disturbing to sleep than continuous noise sources. Additionally, aircraft noise is more annoying when it occurs at times when people expect to rest or sleep and can produce short-term adverse effects, such as mood changes and poor performance at work the next day. The possibility also exists for more serious effects on health and well-being when sleep interference continues over long periods of time.

Though studies of aircraft noise-induced sleep disturbance have noted that while the use absolute event-based sound levels such as SELs are less likely to accurately predict awakenings than other noise effects from airport to airport, it has been established that the consideration of habituation and the noise environment of the existing properties neighboring an airport in conjunction with event-based noise levels such that the relative change in single event noise levels is a strong predictor of sleep disturbance<sup>3</sup>. This would indicate that the analysis of existing and project generated single event levels is specially needed to fully evaluate noise impacts in areas which will be newly exposed to aircraft noise due to future project aircraft operations or temporary construction related aircraft noise increases.

In terms of precedent for this approach, it should be noted that recent the noise analyses of the Bob Hope (Burbank) Airport and the San Jose International Airport (SJC) present and discuss event-based aircraft noise data.

- The Noise Analysis of the Burbank Airport - Replacement Terminal EIR<sup>4</sup> contains SEL contours and SEL data tables to compare the SEL values for the noisiest passenger aircraft at the Airport at selected noise-sensitive receptors. Though the discussion of this analysis notes that this provided for informational purposes only disclosing this information, it is noted in this document that aircraft SEL data is valuable in demonstrating the spatial extent of noise events resulting from aircraft operations for various project alternatives.
- The Noise Assessment for the SJC Master Plan EIR<sup>5</sup> also presents Time Above (TA) values

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<sup>3</sup> Fidell S., Tabachnick B., Mestre V., and Fidell L. "Aircraft noise-induced awakenings are more reasonably predicted from relative than from absolute sound exposure levels," *The Journal of the Acoustical Society of America* 134, 3645 (2013)

<sup>4</sup> RS&H, Inc for the Burbank-Glendale-Pasadena Airport Authority, Appendix K Noise Analysis, Environmental Impact Report for a Replacement Airline Passenger Terminal at Burbank Bob Hope Airport, June 2016

<sup>5</sup> BridgeNet International for David J. Powers and Associates, Norman Y. Mineta San Jose International Airport Noise Assessment for the Master Plan Environmental Impact Report, October 2019

for aircraft noise levels are greater than 75 dB and 85 dB at various receiver points, along with the overall land area exposed the SEL values for the departure and arrival of various aircraft types. It is also noted in SJC EIR that an earlier (2003) EIR contained a similar analysis comparing existing and future SEL conditions and identified increases in SEL values in the airport vicinity.

Considering this, I&R believes that the aircraft noise analysis should at least provide event-based noise data such as maximum noise levels, single event levels, and/or time above information for existing and future aircraft operations at residential and other noise sensitive uses in the airport vicinity. Additionally, we would note that the modeling software used in the noise analysis (FAA AEDT), has the ability to create a grid analysis graphic of changes in event based (Lmax) aircraft noise levels at residential and other noise sensitive uses in the airport vicinity. The inclusion of such a graphic and event-based noise data in combination with information provided on awakenings, sleep disturbance, and physiological effect of aircraft noise would allow the surrounding communities to be more fully informed as to the potential effects and impacts of aircraft noise.

#### Aircraft Noise Modeling

I&R concurs that the use of the FAA AEDT computer model as discussed in section 4.7.1.2.1 is appropriate for analyzing aircraft noise in the surrounding communities. However, we are surprised that the future analysis study year is only 10 years from the baseline year (2028), whereas many large projects include study years which are 20 years in the future so as to avoid a future year too close to the current year once the project is implemented.

The SJC EIR, referenced above, used 20 years as its future analysis point future by analyzing the future noise environment due to aircraft operational levels from the approved aviation forecast in its 2017 Master Plan study to the year 2037. Many other masterplan studies and major infrastructure projects I&R has been involved with have analyzed future transportation noise impacts 20 or more years in the future. Large infrastructure projects in the local area where future noise projections of 20 or more years in the future have been analyzed include EIRs for the Port of Los Angeles Everport (Berths 226 to 236) and TraPac (Berths 136-147) Container Terminal Improvements Projects.

Additionally, Section 2.3.1.2 of the report titled, Project Future Growth at LAX, presents airport passenger forecasts for LAX to the year 2045, and over a planning period of 25 years. Considering that planning projections have been completed to this year, it seems reasonable to also analyze aircraft noise in the surrounding communities to 2045 or at least to 20 years beyond the project baseline year (2038).

We also note that project shows the same future growth rate with or without the project under future year conditions. While I&R cannot evaluate noise from future growth without quantitative projections it would seem that because the project is intended to encourage and support growth, future conditions with the project there would be an increase in airport operations over future conditions without the project. Considering this it appears to be useful to establish a study year which is 20 years in the future (2038) to fully analyze the future growth in operations allowed by the project.

#### Construction Related Aircraft noise increases

Section 4.7.1.2.2 notes that construction improvements to the north airfield would require the short-term (4.5 month) closure of runway 6L-24R (2023) and 6R-24L (2024) and that during these closures, aircraft take off and landings would occur at the remaining three runways. This operational modification would change the aircraft noise contours in surrounding noise sensitive areas, however as stated in the first full paragraph on page 4.7.1-17, the impact of this change was only evaluated qualitatively in the DEIR.

In keeping with the qualitative analysis of this impact (Impact 4.7.1-1 on page 4.7.1-32) the DEIR acknowledges that the temporary runway closures and reassignments would result in temporary increases in areas exposed to noise levels above 65 dBA CNEL but does not define the areas impacted or quantify the resulting noise level increases. Though, on pages 4.7.1-39 through 4.7.1-41, the DEIR discusses the effect of the temporary runway closures on residential areas currently exposed to a CNEL of 65 dBA and above as well as noise sensitive areas which would be newly exposed to levels above 65 dBA due to these changes, it also does not specifically define these areas. The areas effected, the number of noise sensitive uses exposed, and levels at these uses should be modeled and quantitatively evaluated in the DEIR so that actual impact of these operational changes can be properly evaluated.

We would further note that though the impact statement again refers to the CNEL metric accounts for sleep disturbance with the use of nighttime penalties, we again believe that the aircraft noise analysis should at least present event-based noise data such as existing and future maximum noise levels, single event levels, and/or time above information for aircraft operations at residential and other noise sensitive uses in the airport vicinity. This data, in combination with this information provided on awakenings, sleep disturbance, and physiological effect of aircraft noise would allow the surrounding communities to be more fully informed as to the potential effects and impacts of aircraft noise.

#### Mitigation of Construction Related Aircraft noise increases

The DEIR finds that it is not practical or feasible to implement sound attenuation improvements for temporary construction related aircraft noise increases. While this may be true, without quantitatively determining the actual noise exposure and number of noise sensitive uses newly exposed to the heightened noise levels, it does not seem adequate to simply state that mitigation is unfeasible. Once the actual noise impact is established, a more accurate determination of the reasonable and feasible mitigation may be made. If this potential impact is great enough it may be reasonable and feasible to install temporary noise treatment, such as noise barrier blankets at highly affected noise sensitive uses and/or relocate the impacted users during periods of high noise impacts.

### **Section 4.7.2 (Traffic Noise)**

#### Environmental Setting

While eight short term traffic noise level measurements were made on the site vicinity, there were no long-term continuous measurements, to establish the diurnal noise patterns in the project area were made. While we understand and have used short term measurement surveys to calibrate traffic noise models long-term reference noise measurements are also needed to quantify the diurnal trend in noise levels and to establish the peak hour traffic noise levels.

### Thresholds of Significance

The use of the 3dBA and 5dBA CNEL is appropriate for the evaluation of city street traffic. However, the use a peak hour L increase of 12 dBA (which equate to more than a doubling of traffic noise) is really only appropriate for highway projects and is not commonly used to evaluate traffic noise impacts from non-highway type traffic. Increases of 3 dBA are commonly considered just noticeable, while increases of 6 dBA are considered a substantial change while a 10 dBA change is subjectively heard as approximately a doubling in loudness<sup>6</sup>. Considering this relationship and depending on the background noise environment, we would consider a peak hour Leq increase of 3 to 5 dBA appropriate for the evaluation of traffic noise impacts. With this criterion four of the receivers (R-001G, R-003G, R004G, and R007G) as identified in Table 4.7.2-4 may be exposed to significant traffic noise impact

### Future Year Impacts

As with the Aircraft Noise Impact Analysis, we are surprised that the future analysis study year is only 9 years from the baseline year (2019 current, 2028 future), whereas many large projects include study years which are 20 years in the future so as to avoid a future year too close to the current year once the project is implemented. Also, as with the Aircraft noise Impact Analysis, we note that project shows the same future growth rate with or without the project under future year conditions. As noted in our comments related to aircraft impacts, we have analyzed such (20 year) future noise projections from other large local area infrastructure projects involving roadway traffic from Port of Los Angeles Container Terminal Improvements Projects.

While I&R cannot evaluate noise from future growth without quantitative projections it would seem that since the project is intended to encourage and support growth, there would be greater traffic in under future conditions with the project than future conditions without it. Considering this it appears to be useful to in a study year which is 20 years in the future (2039 or 2038 to be consistent with the Aircraft analysis) to fully analyze the future growth in operations allowed by the project.

### **Section 4.7.2 (Construction Noise)**

The noise analysis fails to adequately analyze construction noise at noise sensitive receptors surrounding project construction areas due to a lack of establishing of ambient conditions through noise measurements and the use of what appears to be a non-realistic 24-hour average construction noise usage model.

The only method used in the noise analysis to evaluate ambient noise conditions at identified noise sensitive receptors surrounding project construction areas was aircraft noise modeling. While it is understood that aircraft noise in the project area is a primary noise source, there are other localized area noise sources, such as roadway traffic, commercial activities and other area uses which would also be expected to contribute the ambient noise. To determine these actual ambient noise levels, a noise measurement survey at the identified noise receivers should have been undertaken for the hours of the day that project construction activities are expected to take place.

Furthermore, though most of the construction activities will occur on the northern portion of the airport, where all but one of the noise modeling points are located, there will be activities such as construction at Terminal 9 and the repaving of the Taxiway C extension that may affect noise sensitive uses to the south. Accordingly, additional construction noise analysis receptors should be added in these areas.

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<sup>6</sup> California Department of Transportation, *Technical Noise Supplement (TeNS)*, Sept.2013, Pg. 2-45 &Table 2-10,

Additionally, the output of the noise modeling is only reported in terms of the CNEL noise metric and not in terms of hourly noise levels. While the Construction Noise analysis does utilize typical source noise levels of construction equipment from the Federal Highway Administration Roadway Noise Construction Model (RCNM), the typical construction noise analyses completed using this model does not report noise levels in terms of a 24-hour average, but in terms of peak hourly average ( $L_{eq}$ ) or maximum ( $L_{max}$ ) noise levels. Though the construction noise analysis reportedly calculated hourly  $L_{eq}$  levels for each construction phase, these levels were not reported and instead a daily CNEL for construction occurring every hour of the day and night were reported.

While, as noted in the DEIR, this daily CNEL construction scenario is very conservative, the DEIR does not report that project construction would actually occur 24-hours a day. Further, if construction activities do occur during nighttime or early morning hours, when ambient noise levels are lower the resulting impact determination may be greater than with the use of the CNEL noise metric. Accordingly, the calculated hourly average and maximum noise level should have been reported and compared to actual (measured) ambient noise conditions at each of the identified noise sensitive receivers during daytime, evening, nighttime, and early morning hours.

This concludes I&R's summary of the noise issues found in an initial review with the LAX Airfield and Terminal Modernization Project DEIR noise sections.

Sincerely,



Fred M. Svinth, INCE, Assoc., AIA  
Senior Consultant, Principal  
***Illingworth & Rodkin, Inc.***

**FREDERICK M. SVINTH, INCE, Assoc. AIA**

Mr. Svinth holds degrees in both architecture and engineering. With this background he has focused his professional interests and experience in room acoustics and the control of noise and vibration within the built environment. In addition to experience working as a power plant field engineer and an architectural designer, he has over 25 years of experience consulting in the U.S. and internationally on various aspects of acoustics and vibration. He has consulted on a large number of projects for public, private and government clients, ranging from the study of environmental noise and vibration related to land-use compatibility to acoustic design within and without all types of residential structures, entertainment venues, religious facilities, and industrial buildings.

Mr. Svinth's unique educational background and professional experience in architecture and engineering enables the firm to develop complete solutions for projects with acoustic and vibration requirements. Fred's focus and technical specialties are involved in architectural acoustics and encompass the design and detailing of all types of new and renovated buildings, the control of noise and vibration for mechanical systems, transportation facilities, and entertainment venues within the built environment, conventional and alternative energy power generation noise control, and noise & land-use compatibility planning.

Mr. Svinth's skills include freehand and computer aided drafting (AutoCAD), heliport and airport noise modeling (HNM & INM), and the use of commercial and in-house software tools for architectural acoustics design and the development of noise control treatment options.

**PROFESSIONAL EXPERIENCE**

|   |                                 |
|---|---------------------------------|
| 2009 to Present: Principal & Sr. Consultant | Illingworth & Rodkin, Inc.      |
| January 2000 to 2009: Senior Consultant     | Cotati, California              |
| & Sept. 1990 to Aug. 1992: Staff Consultant |                                 |
| August. 1997 to January 2000                | Jack Evans & Associates, Inc.   |
| Senior Acoustical Consultant                | Austin, Texas                   |
| August 1996 to August 1997                  | Chiles Architects, Inc.         |
| Architectural Designer/Project Manager      | Austin, Texas                   |
| March 1996 to August 1996                   | Madison Graham Architects, Inc. |
| Architectural Designer                      | Austin, Texas                   |
| June 1989 to September 1990                 | General Electric Corp.          |
| Power Systems Field Engineer                | Oakland, California             |

**EDUCATION**

|                                      |  |
|--------------------------------------|--|
| Master of Architecture Degree (1996) | University of Texas at Austin  |
| B.S.- Mechanical Engineering (1989)  | California Polytechnic State University<br>San Luis Obispo, California |

**PROFESSIONAL AFFILIATIONS**

Associate, American Institute of Architects  
Member, Acoustical Society of America  
Member, Institute of Noise Control Engineers

**ATTACHMENT C**

**Griffin Cove Transportation Consulting, PLLC**

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January 14, 2021

Ms. Laurel L. Impett, AICP  
Shute, Mihaly & Weinberger LLP  
396 Hayes Street  
San Francisco, California 94102

Subject: ***Review of Transportation Analysis  
Draft Environmental Impact Report  
Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project  
Los Angeles, California***

Dear Ms. Impett:

As requested, Griffin Cove Transportation Consulting, PLLC (GCTC) has completed a review of the “Transportation” section of the Draft Environmental Impact Report (DEIR) completed with respect to the proposed Airfield and Terminal Modernization Project (ATMP Project) at Los Angeles International Airport (LAX) in Los Angeles, California. (Reference: Los Angeles World Airports, *Airfield and Terminal Modernization Project – Los Angeles International Airport (LAX) – Draft Environmental Impact Report (Draft EIR)*, October 2020.) The “Transportation” analysis is presented in DEIR Section 4.8, with additional, more detailed information provided at DEIR Appendix G. No separate technical report was prepared.

Our review focused on the technical adequacy of the transportation analysis presented in the DEIR, including the detailed procedures and conclusions documented there.

**DRAFT ENVIRONMENTAL IMPACT REPORT REVIEW**

Our review of the DEIR revealed a number of issues affecting the validity of the transportation analysis results. These issues, which are presented below, must be addressed prior to certification of the environmental document and approval of the proposed ATMP Project.

1. **Project Description** – DEIR Section 2 - Description of the Proposed Project inadequately describes key components of the proposed ATMP Project’s transportation system, including the following:

Project Roadway System

According to the ATMP DEIR (p. 2-39), the project, “. . . would build upon improvements approved as part of the LAX Landside Access Modernization Program . . .” The DEIR (p. 2-10) also refers to “refinements” to the LAMP road system, with the proposed Project’s improvements being “integrated with” the LAMP elements. This raises the following questions:

- Will development of the ATMP project, as proposed, eliminate or significantly modify any elements of the previously-approved road system for the LAMP project?
- What specific changes are proposed to the LAMP road system in connection with the ATMP project? A figure is needed to graphically identify the ATMP-proposed changes to the LAX road system, specifically with regard to the approved LAMP roadway system.



### Project Parking System

The number of parking spaces to be provided in the Terminal 9 structure is not stated in the DEIR, nor is there a breakdown of the number of long-term vs. the number of short-term parking spaces.

2. **Vehicle-Miles-Traveled Analysis** – The DEIR analysis of vehicle-miles-traveled (VMT) addressed three forms of VMT:
- Daily VMT per Employee: “. . . the average VMT generated by each employee at airport uses on a typical weekday.” (DEIR, p. 4.8-9)
  - Daily Passenger VMT: “. . . total VMT generated by airport passengers on a typical weekday.” (DEIR, p. 4.8-14)
  - Induced VMT (Short-Term and Long-Term): “. . . VMT that is unrelated to airport trips, but is rather related to the improved roadway operations on nearby surface streets as a result of the roadway improvements that are part of the proposed Project.” (DEIR, p. 4.8-14)

The DEIR concluded that the ATMP Project would cause significant impacts with respect to all three types, and that only VMT per Employee could be mitigated to a Less Than Significant level. Passenger VMT and Induced VMT were determined to be Significant and Unavoidable impacts.

The VMT estimates documented in the DEIR were generated by the LAX Airfield and Terminal Modernization Project Travel Demand Model, which was modified to add roadway system detail, among other modifications. Travel demand forecasting models typically include fairly rudimentary, schematic-level road systems, which do not necessarily reflect the specific details of the existing or proposed road system. For example, multiple driveways serving a number of individual properties might be combined into a single “centroid connector,” which is used to load the traffic associated with those land uses onto the regional road system within the model.

The access system proposed to serve the ATMP Project in the immediate vicinity of the LAX Central Terminal Area (CTA) is rather complex requiring, in some cases, substantial “out-of-direction” travel to enter or exit the CTA. It is unclear whether the model’s roadway network accurately accounts for the actual ATMP Project travel paths (and the associated distances) required of visitors to LAX. We particularly wonder about the level of precision in the VMT analysis, and the associated level of accuracy. As noted above, implementation of the ATMP Project will modify certain travel paths for traffic entering and exiting the LAX CTA, compared to the approved LAMP Phase 1 roadway system. In some cases, the travel paths proposed for the ATMP Project are substantially longer than would exist under the LAMP Phase 1 plan.

Of particular concern are potential adverse impacts with respect to CTA traffic flowing to and from Sepulveda Boulevard, including traffic to and from the City of El Segundo. Attachments A and B present figures illustrating selected access routings for the ATMP and LAMP projects at LAX, based on information in the respective EIR documents. Included are figures showing the following travel paths for both projects:

- From El Segundo to the CTA via northbound Sepulveda Boulevard (Figures A-1 and A-2),
- From the CTA to El Segundo via southbound Sepulveda Boulevard (Figures A-1 and A-2),
- From southbound Sepulveda Boulevard to the CTA (Figures B-1 and B-2), and

- From the CTA to northbound Sepulveda Boulevard (Figures B-1 and B-2).

#### From El Segundo to the CTA via Northbound Sepulveda Boulevard

The traffic patterns for vehicles traveling from El Segundo to the CTA vary substantially between the two projects. For LAMP Phase 1, the existing route will continue to be in place, as shown in Attachment A, Figure A-1 using red arrows. That route involves a relatively short ramp that diverges from northbound Sepulveda Boulevard immediately north of the Sepulveda Tunnel and connects directly to the upper and lower level roadways within the CTA.

For the ATMP project, though, drivers will continue northward on Sepulveda Boulevard past the existing ramp (which will be demolished) and exit the road on a new off-ramp beginning at approximately 98<sup>th</sup> Street, as shown on Figure A-2 in Attachment A (red arrows). The new ramp will curve to the east, following the approximate alignment of 96<sup>th</sup> Street before curving to the south, then east again at about 98<sup>th</sup> Street, before curving back to the south along the general alignment of a new “A” Street, and finally curving back to the west to enter the CTA. As indicated by this description, the proposed ramp roadway between northbound Sepulveda Boulevard and the CTA is quite circuitous with several curves, which could potentially create a safety issue.

Based on scaling distances from Google Earth, we estimate that the proposed ATMP routing will add roughly 3,900 feet (0.74 mile) to the travel distance for drivers.

#### From the CTA to El Segundo via Southbound Sepulveda Boulevard

Traffic exiting LAX and heading south to El Segundo gets to Sepulveda Boulevard much more directly under the LAMP Phase 1 scheme, which employs the existing pair of relatively short ramps leading directly from the outbound (eastbound) CTA road system to southbound Sepulveda Boulevard. (There are two ramps because one originates on the upper level CTA roadway and the other on the lower level CTA roadway.) While upper level CTA traffic connects directly to a ramp leading to southbound Sepulveda Boulevard, traffic from the lower level roadway passes through an existing traffic-signal-controlled intersection to access a ramp leading to that roadway. Figure A-1 in Attachment A illustrates this travel path using blue arrows.

In contrast, with implementation of the ATMP Project, drivers from both CTA levels headed to southbound Sepulveda Boulevard would follow a highly convoluted exit route, which involves traveling east almost past the proposed Terminal 9, then north to roughly the alignment of existing 98<sup>th</sup> Street, then west, before eventually heading south and merging onto Sepulveda Boulevard. This travel path is shown using yellow arrows on Figure A-2 in Attachment A. Using Google Earth, we conservatively estimate the total additional travel distance resulting from following that loop at about 5,000 feet (almost 0.95 mile).

In addition, ATMP Project traffic exiting the CTA upper level and headed southbound on Sepulveda Boulevard must go around a loop ramp within the CTA to access the outbound traffic stream. Use of that loop ramp, which is approximately 1,700 feet (0.32 mile) long, would not be necessary under the LAMP Phase 1 scheme.

Consequently, travel time and distance will be substantially greater under the ATMP scheme, which would also equate to an increase in vehicle-miles-traveled (VMT).

#### From Southbound Sepulveda Boulevard to the CTA

Traffic approaching the CTA from southbound Sepulveda Boulevard would be forced to follow a much more circuitous route under the ATMP Project road system. The LAMP Phase 1 project would provide a direct connection from southbound Sepulveda Boulevard to both levels of the CTA road system via a pair of new ramps, as shown on Figure B-1 in Attachment B (red arrows).

Under the ATMP Project, vehicles exiting southbound Sepulveda Boulevard toward the CTA would first travel east on a circuitous new ramp system beginning at approximately 98<sup>th</sup> Street, then south at the alignment of the new “A” Street before heading west to approach the CTA along the general alignment of Century Boulevard. This proposed route is illustrated on Figure B-2 in Attachment B (red arrows). Again using Google Earth, we estimate the length of this out-of-direction travel at about 3,200 feet (0.646 mile).

#### From the CTA to Northbound Sepulveda Boulevard

Drivers exiting the CTA and traveling to the north on Sepulveda Boulevard will also travel substantially farther under the proposed ATMP Project road system. Figure B-1 in Attachment B (blue arrows) shows that, under the LAMP Phase 1 road scheme, such drivers will follow the existing travel path, which involves traversing a loop ramp just outside the CTA and gaining immediate access to northbound Sepulveda Boulevard.

Implementation of the ATMP Project road system will require those same drivers to travel east to approximately the alignment of the new “A” Street, where they will turn to the north before curving back to the west at approximately existing 96<sup>th</sup> Street, eventually reaching a traffic-signal-controlled intersection at Sepulveda Boulevard. This new routing is illustrated using yellow arrows on Figure B-2 in Attachment B.

Both schemes would require upper level CTA drivers to traverse the internal, 1,700-foot loop ramp within the CTA.

The additional travel distance on the proposed ATMP Project road system is estimated at 1,220 feet (0.23 mile), compared to the LAMP Phase 1 system, based on scaling distances from Google Earth.

#### CTA Traffic Design Day Demand

DEIR Appendix G presents information describing the characteristics of vehicular traffic at LAX. Of particular interest are Table G.4-7 (“Summary of 2028 Proposed Project Terminal 1 to Terminal 8 Hourly Volumes – Lower Level”) and Table G.4-8 (“Summary of 2028 Proposed Project Terminal 1 to Terminal 8 Hourly Volumes – Upper Level”) from that appendix (pp. G.4-8 – G.4-9). Those tables present hourly traffic volumes for the CTA upon completion of the ATMP Project on a Friday in August, which was designated as the “design day” for this analysis. The traffic volumes represent activity within the CTA at Terminals 1 – 8 only, excluding Terminal 9. The traffic volumes also reflect completion of the Intermodal Facility (ITF) East, the ITF West, and the Consolidated Rental Car (CONRAC) facility, although traffic associated with those projects generally does not enter or exit the CTA. For ease of reference, those tables are presented here as Attachment C.

Also presented in Attachment C are five spreadsheets derived from the information in those two tables.

*Ms. Laurel Impett, AICP  
Shute, Mihaly & Weinberger, LLP  
January 14, 2021  
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Table C-1 illustrates the tabulation of 2028 design day traffic volumes using northbound El Segundo Boulevard to access the CTA. As shown there, a total of 22,418 design day vehicles would approach the CTA using that routing upon completion of the ATMP Project.

Table C-2 summarizes the volume of 2028 design day traffic departing the CTA and heading southbound on Sepulveda Boulevard toward El Segundo. According to Table C-2, a total of 32,490 vehicles per day would exit the CTA and head south on Sepulveda Boulevard (17,902 from the CTA lower level and 14,588 from the CTA upper level).

Table C-3 shows how many upper level exiting vehicles would be required to traverse the internal loop within the CTA to reach either direction of Sepulveda Boulevard. Based on the LAX projections, a total of 25,832 vehicles per day would do so on the 2028 design day upon completion of the ATMP Project. Southbound traffic would represent 14,588 of those vehicles, while 11,244 would be traveling northbound.

Table C-4 summarizes similar calculations for traffic entering the CTA from southbound Sepulveda Boulevard. That table shows that 38,709 vehicles/day are expected to do so.

Finally, Table C-5 summarizes the daily volume of traffic projected to travel from the CTA to northbound Sepulveda Boulevard. A total of 19,333 daily vehicles are expected to follow this routing, with 8,089 from the CTA lower level and 11,244 from the CTA upper level.

As noted above, these traffic volumes do not include activity generated at Terminal 9; those values are presented separately in DEIR Appendix G. Consequently, the traffic volume numbers presented here are conservative values, as are the estimates of vehicle-miles-traveled presented below.

#### Vehicle-Miles-Traveled Estimates

As noted above, on the 2028 design day, 22,418 vehicles are expected to enter the CTA from northbound Sepulveda Boulevard. Under the proposed ATMP Project road system, those vehicles will be required to travel an additional 3,900 feet (0.74 mile) compared to the baseline LAMP Phase 1 scheme. This will result in additional VMT of 16,560 miles each day.

A total of 32,490 vehicles per day are expected to travel south on Sepulveda Boulevard from the CTA. Requiring all of these vehicles to traverse the circuitous, 5,000-foot-long (0.95 mile) path described above to get from the CTA to southbound Sepulveda Boulevard will add approximately 30,770 VMT daily, compared to the LAMP road system. This estimate ignores traffic exiting Terminal 9, which will follow essentially the same route; thus, the number is a conservative indication of additional VMT.

Retaining the internal CTA loop ramp that will serve upper level CTA vehicles traveling southbound on Sepulveda Boulevard will add about 4,700 VMT daily, based on 14,588 upper level vehicles traveling 1,700 feet (0.32 mile) around the loop.

Also, 38,709 vehicles per day are projected to approach the CTA from the north via southbound Sepulveda Boulevard. The additional 3,200 feet (0.61 mile) of travel proposed in conjunction with the ATMP Project will result in a daily increase of 23,460 VMT.

The additional VMT associated with drivers traveling the additional 1,220 feet (0.23 mile) from the CTA to northbound Sepulveda Boulevard will add 4,470 VMT, based on a projected 2028 daily traffic volume of 19,333.

Thus, the CTA-area roadway system modifications directly associated with the proposed ATMP Project will add approximately 79,960 VMT daily, in comparison to the approved LAMP Phase 1 road system, which serves as the baseline for this analysis. We believe this value is conservative, as it does not include traffic associated with Terminal 9, some of which will follow travel paths similar to those described above.

In contrast, the DEIR claims that the ATMP Project will result in additional passenger VMT of 32,786 miles/day, which is roughly 40 percent of our estimate based on detailed evaluation of the CTA road system proposed as part of the ATMP Project.

Table 1 summarizes this VMT estimate.

| <b>Table 1<br/>Estimated Additional Vehicle-Miles-Traveled<br/>Due To ATMP Project Road System at Central Terminal Area (Terminals 1 – 8)</b>  |   |   |   |
|--|---|---|---|
| <b>Travel Path</b>   | <b>2028<br/>Design Day<br/>Traffic Volume<sup>1</sup></b> | <b>Approximate<br/>Additional<br/>Travel Distance<sup>2</sup></b> | <b>Additional<br/>Vehicle-Miles-<br/>Traveled</b> |
| From El Segundo to the CTA via Northbound Sepulveda Boulevard  | 22,418 Vehicles   | 3,900 feet<br>(0.74 mile)   | 16,560 Vehicle-Miles                              |
| From the CTA to El Segundo via Southbound Sepulveda Boulevard  | 32,490 Vehicles   | 5,000 feet<br>(0.95 mile)   | 30,770 Vehicle-Miles                              |
| CTA Upper Level Loop to Southbound Sepulveda Blvd.   | 14,588 Vehicles   | 1,700 feet<br>(0.32 mile)   | 4,700 Vehicle-Miles                               |
| From Southbound Sepulveda Boulevard to the CTA   | 38,709 Vehicles   | 3,200 feet<br>(0.61 mile)   | 23,460 Vehicle-Miles                              |
| From the CTA to Northbound Sepulveda Boulevard   | 19,333 Vehicles   | 1,220 feet<br>(0.23 mile)   | 4,470 Vehicle-Miles                               |
| <b>TOTAL</b>   |   |   | <b>79,960 Vehicle-Miles</b>                       |
| Notes:   |   |   |   |
| <sup>1</sup> Reference: DEIR Appendix G, Table G.4-7 (“Summary of 2028 Proposed Project Terminal 1 to Terminal 8 Hourly Volumes – Lower Level”) and Table G.4-8 (“Summary of 2028 Proposed Project Terminal 1 to Terminal 8 Hourly Volumes – Upper Level”) |   |   |   |
| <sup>2</sup> Estimated by scaling distances from Google earth  |   |   |   |

Consideration of the three forms of VMT that were analyzed in the DEIR raises substantial questions as to whether the additional VMT cited here has been accounted for. We can readily conclude that it is not included within the Employment VMT category, as that analysis focused on employee commute trips, which rarely (if ever) involve travel within the CTA. Attachment D presents DEIR Figure 4.8-3 – Driveway Count Locations (DEIR, p. 4.8-13), which “. . . shows the location of public and private passenger parking lots, rental car facilities, employee parking lots, and cargo facilities . . .,” none of which are within the CTA. Further, “[t]he average Daily VMT per Employee rate was estimated for parking lots where it was possible to isolate employee counts.” (DEIR, p. 4.8-11) Again, this focus on

employee parking lots (which are outside the CTA) suggests that the additional VMT described above is excluded from the DEIR’s Employment VMT value.

Similarly, we can conclude that it would not be part of the Induced VMT that was derived in the DEIR analysis, as that form of VMT “. . . is unrelated to airport trips, but is rather related to the improved roadway operations on nearby surface streets . . .” as defined above. (DEIR, p. 4.8-14)

Consequently, it must be included (if at all) within the Passenger VMT. The DEIR describes that parameter as follows (DEIR, p. 4.8-14):

*The total airport passenger VMT is the sum of all passenger VMT traveling directly to the CTA (as well as to the ITF East and ITF West in the 2028 future year scenarios) and to the major LAX parking facilities.*

DEIR Tables 4.8-10 (p. 4.8-41) and 4.8-13 (p. 4.8-51) summarize the results of the VMT analyses. Table 2 below reproduces the Total Passenger VMT data.

| <b>Table 2<br/>Total Passenger VMT Summary</b> |   |  |  |
|--|---|--|--|
| Existing Conditions<br>(2019)                  | Projected Future<br>Conditions Baseline<br>(2028) | Future Conditions<br>Baseline + Proposed<br>Project (2028) | Proposed Project<br>Incremental Increase |
| 6,581,811                                      | 8,676,209   | 8,708,995  | 32,786                                   |

As shown, the DEIR projects a Project-related increase in Passenger VMT of 32,786. However, as we demonstrated above, the CTA roadway system modifications proposed as part of the ATMP Project will result in a VMT increase of almost 80,000 VMT daily, a difference of over 47,000 VMT daily. Further, as we pointed out above, we believe our estimate is conservative as it includes activity within the CTA only (i.e., Terminals 1 – 8). No Terminal 9 activity is included. Similarly, whereas the DEIR’s estimate of passenger VMT (as defined above) includes the ITF East, ITF West, and major LAX parking facilities (presumably including off-site parking facilities), our estimate excludes any locations beyond the boundaries of the CTA. It is, therefore, apparent, that the DEIR substantially understates the VMT-related impacts of the ATMP Project, due to its failure to accurately reflect the vehicular access system proposed to serve the CTA.

The VMT analysis must be revised to correct this substantial deficiency, and it must then be recirculated for further public review.

Vehicle-Miles-Traveled Mitigation

The VMT-related mitigation measures include a variety of strategies encompassed within a “VMT Reduction Program,” as described in the mitigation measure designated MM-T (ATMP)-1. (DEIR, p. 4.8-52) One of the key VMT reduction strategies delineated in the mitigation measure is the establishment of an “on-demand micro-transit shuttle.” According to the DEIR (p. 4.8-53):

*. . . LAWA is currently engaged in the development of an employee shuttle in partnership with the City of Inglewood and a separate pilot program in partnership with Metro. The expansion of these pilot programs into full programs, and expansion of the service area*

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*beyond the City of Inglewood and the Metro service area, would result in additional reduction of single-occupancy commute trips to LAX from the nearby neighborhoods.*

Given that El Segundo borders LAX to the south and is, therefore, closer to the airport than Inglewood, this mitigation measure should be amended to specifically include micro-transit shuttle service serving El Segundo. City of El Segundo representatives should be directly involved in discussions concerning how and where this service would operate within the city.

Further reductions in VMT could potentially be achieved through improved bicycle connections between El Segundo and LAX, as well. Therefore, Mitigation Measure MM-T (ATMP)-1 should be expanded to call for implementation of improvements necessary to facilitate such bicycling activity, particularly for LAX employees residing in and near El Segundo.

3. **Terminal 9 Access** – Vehicles traveling to Terminal 9 and its parking structure from northbound Sepulveda Boulevard will pass through a traffic-signal-controlled intersection on Century Boulevard at the proposed new “A” Street. Traffic from northbound Sepulveda Boulevard to eastbound Century Boulevard will pass through this same intersection, as will eastbound traffic departing the CTA. The DEIR provides no information regarding traffic operations at this location. Of particular concern is the possibility that congestion at that location will cause vehicular queues on the eastbound intersection approach to back up onto northbound Sepulveda Boulevard and even into the Sepulveda Tunnel. This raises the following questions:

- Upon completion and occupancy of Terminal 9 and its parking structure, how long will eastbound vehicular queues extend from the traffic signal-controlled intersection referenced above?
- Will the queues extend onto northbound Sepulveda Boulevard/Pacific Coast Highway, including into the Sepulveda Tunnel?
- What are the safety impacts on Sepulveda Boulevard/Pacific Coast Highway, particularly with regard to increased collisions on the road due to development of Terminal 9 and its associated traffic?

Moreover, LAWA indicated that temporary access to Terminal 9 will be provided via direct ramps from northbound Sepulveda Boulevard while the ATMP improvements are being constructed. Two ramps are proposed, one to the arrivals level and one to the departure level.

- How long will vehicular queues on the temporary inbound ramps (from northbound Sepulveda Boulevard/Pacific Coast Highway to Terminal 9) be?
- Will these queues exceed the lengths of the temporary ramps, thereby extending onto northbound Sepulveda Boulevard and creating a safety issue, particularly with regard to increased rear-end collisions?

We are concerned that implementation of these direct ramps from northbound Sepulveda Boulevard to Terminal 9, even on a temporary basis, will exacerbate congested conditions in and near the Sepulveda Tunnel. Beyond further congestion, we envision impacts with regard to safety, including a reasonable likelihood of additional vehicular collisions in this area. Because of this, we believe that other alternatives for construction-period vehicular access to/from Terminal 9 must be considered, specifically with respect to traffic approaching/departing via Sepulveda Boulevard/Pacific Coast Highway in or through El Segundo. Such alternatives should avoid direct access from northbound

Sepulveda Boulevard to Terminal 9. Ideally, under all circumstances (i.e., construction period and beyond), Terminal 9 access would be provided via the same set of ramps and roadways that will ultimately serve the CTA upon completion of the ATMP Project.

4. **Construction Impacts** – DEIRs typically address the transportation-related impacts that will occur during the proposed Project’s construction period. Those analyses generally provide an estimate of the amount of construction-related traffic that will occur, in terms of construction worker commute trips as well as various forms of truck trips (goods/material deliveries, haul trips, etc.).

This DEIR contains no such analysis. Review of the DEIR Table of Contents shows that construction impacts were addressed for most other topic areas, with the only other exceptions being cultural resources and land use and planning. Consequently, the construction-period traffic and parking impacts on El Segundo and surrounding areas were ignored. For comparison, the LAX LAMP project DEIR contained a highly-detailed construction traffic analysis, which encompassed 52 pages.

We note that the LAMP EIR found that that project’s construction traffic impacts were significant and unavoidable. (LAMP DEIR, p. 1-20) Had the ATMP Project DEIR conducted the necessary analysis, it would have undoubtedly determined that the ATMP Project's construction-related transportation impacts would also be significant, thus triggering the requirement for feasible mitigation.

Limited information regarding construction phasing, staging, contractor parking, haul routes, and access during construction is presented in DEIR Section 2.6 (beginning at page 2-77). Temporary access to the CTA and Terminal 9 is addressed at pp. 2-82 – 2-83, including the extensive traffic reroutings that will be necessary. None of this addresses the impacts of the construction activity on traffic operations and safety in the vicinity of LAX, however.

DEIR Section 2.6.2 includes the following statements (p. 2-78):

- *To the extent possible . . . employee contractor parking for the proposed Project would be located adjacent to or within the construction sites for the proposed facilities.*
- *Construction employees could be shuttled between construction sites and construction employee staging/parking areas, if/as warranted.*

However, no additional detail is provided. Furthermore, there is no indication how (or if) these measures would be enforced so as to ensure that construction workers park on-site. The use of the word “could” (in “could be shuttled”) as opposed to the more definitive “would” or “shall” is concerning. Similarly, the implicit limitation of “if/as warranted” raises concerns. Who will determine if/when this is warranted and what criteria will be applied to make that determination?

The DEIR states that construction activities would be coordinated through a Coordination and Logistics Management (CALM) team to be established by Los Angeles World Airports (LAWA). The functions of the CALM team are spelled out in LAWA’s *Design and Construction Handbook (DCH)*<sup>1</sup>, although the membership of that critical in-house organization is not specified. According to the DCH (Division 1 – Page 4 of 68):

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<sup>1</sup> <https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook>



*The CALM Team's mission statement is to minimize construction-related impacts to passenger service and tenants.*

This suggests that the CALM team ignores any construction-related impacts that extend beyond the borders of LAX. We believe that, given the magnitude of the proposed ATMP Project, this is a significant shortcoming.

It is essential that a mitigation measure be added to require that the CALM team be expanded to include the City of El Segundo as a key member, to ensure that the City is able to provide necessary input regarding construction-related working hours and days, traffic control plans, construction staging, and contractor parking issues. The CALM team must also include a qualified traffic engineer (licensed by the State of California as a Civil or Traffic Engineer) acceptable to the City of El Segundo, who would be responsible for monitoring construction-related traffic congestion and would have the authority to order timing plan changes for traffic signals within El Segundo and surrounding areas, when necessary.

In addition, the standard construction period procedures employed by LAWA must be expanded through an additional mitigation measure addressing the dissemination of public information to residents and businesses within El Segundo and other nearby jurisdictions. Establishment and maintenance of a Project-specific website with current construction status information is one measure that should be employed. Also, e-mail and postal updates should be provided on a regular basis to those same areas, including notification of lane closures, detours, hauling activities, etc.

Finally, LAWA must undertake a process, in coordination with the City of El Segundo, to mitigate haul route pavement damage incurred as a result of the ATMP Project. This process should involve development of a baseline Pavement Condition Index (PCI) for key roadways identified by El Segundo prior to initiation of construction work. (The PCI is a numerical index between 0 and 100, which indicates the condition of a pavement section.) Following completion of the ATMP Project, the PCI evaluation process should be repeated, and LAWA would then be responsible for undertaking any necessary pavement repairs, repaving, or roadway reconstruction, to the satisfaction of the City of El Segundo. During the course of the ATMP Project construction period, LAWA must also respond promptly to City requests for evaluation of specific areas of concern regarding pavement conditions.

5. **Construction Haul Routes** – DEIR Section 2.6.3 (p. 2-82) describes the process for establishment of construction haul routes, which consists of two elements: (1) LAWA would submit a Haul Route Form and Haul Route Map to the Los Angeles Department of Building and Safety, and (2) a Site Logistics Plan would be submitted to the LAX CALM Team.

The City of El Segundo should be included as an active participant in the establishment of haul routes and in the review and approval of the Site Logistics Plan, as described in Section 1.2 of the LAWA *2020 Design and Construction Handbook* (Division 1 – Page 4 of 68).

6. **Project Trip Generation** – The volume of traffic associated with the proposed ATMP Project is summarized in DEIR Table 4.8-7 (p. 4.8-39). A total of 8,190 daily trips are projected. According to the DEIR, only trips associated with the 4,700 estimated new employees in Concourse 0 and Terminal 9 will generate trips. No additional passenger-related trips are assumed. In effect, the assumption is that the proposed ATMP Project is intended to accommodate passenger demand that will occur regardless of whether the ATMP Project is completed; passenger traffic will simply be redistributed within the airport and no off-site traffic impacts will be associated with those passengers. No support is provided for these assumptions, however.

We find it somewhat ironic that the DEIR touts the ability of the ATMP Project to “improve overall access to and from the CTA” (DEIR, p. 2-39), “reduc[e] traffic congestion on Sepulveda Boulevard” (DEIR, p. 2-39), and “help keep airport-related traffic congestion and back-up off public streets” (DEIR, p. 2-10), but fails to recognize that such improvements (were they to actually materialize) would have the effect of improving the attractiveness of LAX for both airlines and passengers. Further, we believe it is reasonable to expect that the proposed airfield improvements will similarly have the effect of making LAX more attractive to airlines, with the resulting air service enhancements drawing more passengers to LAX. These factors will clearly result in additional vehicular traffic, which has not been addressed in the DEIR.

Although the DEIR trip generation estimate accounts for the various travel modes to be used by employees (vanpool, carpool, walk/bike/transit, and drive alone), all employees are assumed to make only 2.0 trips per day – one from home to work and the return trip home. None of the employees are assumed to make a trip during the course of a work day (e.g., to attend an off-site meeting, eat lunch, or perform a work-related errand). Again, no support is provided for this assumption.

The ATMP Project trip generation estimate also ignores any non-employee trips that will certainly be associated with the new concourse and terminal facilities. Such trips might be additional deliveries, service trips, etc.

No estimate of peak-hour trips is presented, although DEIR Appendix G presents estimates for the following time periods (which were used in the travel demand forecasting model employed in the analysis):

- AM peak period (6:00 – 9:00 AM),
- Midday period (9:00 AM – 3:00 PM),
- PM peak period (3:00 – 7:00 PM), and
- Night-time period (7:00 PM – 6:00 AM).

Historically, peak-hour traffic volumes represented the most basic element in a traffic impact analysis. For an analysis based on vehicle-miles-traveled (VMT), such as this one, peak-hour volumes are unnecessary. However, this information still provides a valuable perspective with regard to local traffic impacts, and is needed to determine the specific project-related impacts on the El Segundo road system, during the construction period and beyond. This is discussed in greater detail later in this letter.

In order to ensure full understanding of the ATMP Project and its impacts on the nearby road system, the DEIR must reveal the projected vehicular traffic demand to be generated by the overall ATMP Project, as well as by Terminal 9 and Concourse 0 individually. Those trip generation estimates should represent the following time periods:

- Daily,
- AM peak hour (inbound, outbound, and total, during the busiest one-hour period between 7:00 and 10:00 AM),
- Midday peak hour (inbound, outbound, and total, during the busiest one-hour period between 10:00 AM and 2:00 PM), and
- PM peak hour (inbound, outbound, and total, during the busiest one-hour period between 3:00 and 6:00 PM).

7. **Traffic Operations** – We understand that under SB 743 the currently-accepted mode of transportation analysis for CEQA documents considers vehicle-miles-traveled (VMT), in place of the traditional approach that addresses intersection and roadway level of service (LOS)<sup>2</sup>. This does not preclude consideration of LOS analyses, where appropriate, however. Of particular concern are traffic operations at certain key off-site intersections and freeway segments where it is reasonable to expect that the proposed ATMP Project would adversely impact quality of life for El Segundo residents and others.

#### Intersection Impacts

For perspective, we note that the LAX LAMP traffic analysis presented detailed level of service analyses for the following 15 intersections, which are under the sole or joint jurisdiction of the neighboring City of El Segundo:

- Vista del Mar/Grand Avenue,
- Main Street/Imperial Highway,
- Sepulveda Boulevard/Imperial Highway,
- Sepulveda Boulevard/Mariposa Avenue,
- Sepulveda Boulevard/Grand Avenue,
- Sepulveda Boulevard/El Segundo Boulevard,
- Sepulveda Boulevard/Rosecrans Avenue,
- Nash Street/I-105 Westbound Ramps/Imperial Highway,
- Nash Street/El Segundo Boulevard,
- Douglas Street/Imperial Highway,
- Douglas Street/El Segundo Boulevard,
- Aviation Boulevard/Imperial Highway,
- Aviation Boulevard/West 120<sup>th</sup> Street,
- Aviation Boulevard/El Segundo Boulevard, and
- Aviation Boulevard/Rosecrans Avenue.

Tables 1 – 3 in Attachment E summarize the level of service results for those locations under AM, midday, and PM peak hour conditions for each of the analysis scenarios addressed in the LAMP traffic study. Intersections that were found to operate at LOS E or F (i.e., at or beyond capacity) are highlighted in yellow. Under City of El Segundo policy, intersections are required to operate at LOS D or better, so the highlighted intersections represent unacceptable operations and violations of city policy.

Five of the fifteen intersections were found to operate at LOS E or F in one or more analysis scenarios in the AM peak hour in the LAMP analysis. In the PM peak hour, nine of the locations were found to do so. This suggests a reasonable likelihood that a development of the magnitude of the proposed

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<sup>2</sup> Intersection and roadway operations have traditionally been described in terms of level of service (LOS), which is reported on a scale from LOS A (representing free-flow conditions) to LOS F (which represents substantial congestion and delay). Capacity is defined to occur at LOS E.

ATMP Project would have a significant adverse impact on intersection operations in El Segundo. However, the DEIR has ignored this possibility.

We note that it is the policy of the City of El Segundo to require level of service analyses for the purpose of assessing traffic impact fees. It would be appropriate, therefore, for the DEIR to incorporate such analyses to ensure that ATMP Project impacts are fully mitigated within the city. Those analyses should address the specific operational impacts of the ATMP Project, in terms of congestion, vehicular delay, level of service, and queuing at the 15 intersections referenced above.

#### Freeway System Impacts

The DEIR has also ignored the impacts of the proposed ATMP Project on the freeway system, as the “freeway safety analysis” included in the DEIR did nothing to address operational or safety conditions on the freeway mainline. Referring again to the LAX LAMP EIR, which included an analysis of the now-defunct Congestion Management Program road network, we see that 46 freeway segments in the vicinity of the ATMP Project were examined (i.e., each direction of 23 individual segments). Of those, 26 were found to operate at LOS E or F in the AM peak hour under 2035 Future with Project conditions. In the PM peak hour, 23 such segments were identified. Again, this suggests a need to evaluate the potential impacts of the ATMP Project on the freeway system serving LAX and surrounding jurisdictions.

The analysis of freeway operations should also address whether implementation of the ATMP Project will encourage drivers to use Sepulveda Boulevard/Pacific Coast Highway as an alternative to I-405. That is, will the ATMP Project cause sufficient congestion on the freeway to divert drivers to the nearby arterial roads? Such an analysis must, of course, consider the effects of the widespread use of cell phone apps (such as Waze, Google Maps, and others) and in-car navigation systems, which often encourage drivers to divert to alternative routes.

#### Midday Analysis

The analysis of the ATMP Project’s traffic impacts should not be limited to the typical AM and PM peak hour periods. The LAX LAMP DEIR (Figure 4.12.1-4) illustrates the pattern of arriving and departing passenger volumes over the course of an entire day. Those patterns are closely linked to the traffic patterns of LAX as a whole. LAMP DEIR Figure 4.12.1-4 (presented here as Attachment F) shows a distinct peak in existing passenger arrival and departure activity at about 11:00 AM. A similar pattern is illustrated in LAMP DEIR Figures 4.12.1-8 and 4.12.1-9, which show projected hourly passenger activity in 2024 and 2035, respectively. In fact, the midday peak is clearly higher than the total passenger activity shown in the AM (7:00 - 9:00 AM) and PM (4:00 - 6:00 PM) peak periods.

In short, the need for a midday traffic analysis is not inconsequential, given the LAX activity patterns. In fact, the 2014 *Traffic Generation Report* for LAX, which is referenced in the LAMP DEIR, specifically refers to “. . . the airport peak hour of 11 am to noon.” (Reference: Los Angeles World Airports, *Traffic Generation Report - Los Angeles International Airport / August 2014*, December 2014, p. 1). The most recent version of that report (for August 2019, published in November 2019) also refers to “. . . the 11 am to noon airport peak hour.” (p. 1) This is further illustrated in LAMP DEIR Table 4.12.2-4 (also in Attachment F), which summarizes the existing trip generation at LAX, as follows:

- AM Peak hour: 12,338 vehicle-trips,
- Midday peak hour: 16,097 vehicle-trips, and

- PM peak hour: 12,840 vehicle-trips.

As shown, the volume of traffic generated at LAX in the midday peak hour is 25 – 30 percent higher than either the AM or PM peak hours.

- Freeway Safety Analysis** – The inappropriately named freeway safety analysis (beginning at DEIR p. 4.8-59) is limited to consideration of whether vehicular queues on freeway off-ramps serving the ATMP Project will extend all the way back onto the freeway mainline, thereby creating the potential for rear-end collisions. Seven off-ramps were evaluated, but only one (I-405 Northbound/Century Boulevard) was found to have 25 or more Project-generated trips in the AM or PM peak hour. (This suggests that, contrary to information presented elsewhere, peak-hour trip generation estimates were developed for the ATMP Project.) We have the following specific comments regarding this analysis.

Traffic Volumes are Suspect

The off-ramp traffic volumes used in the analysis are suspect. As an initial matter, it is difficult to believe that only one of the freeway off-ramps serving LAX will have 25 or more Project-related peak-hour trips. Because the ATMP Project’s peak-hour trip generation estimates were not revealed in the document, it is impossible to verify this conclusion.

As shown in Table 3 below, the right-turn off-ramp volumes (i.e., NBR) in the 2028 Baseline scenario are 90 - 95 percent lower than the Existing right-turn volumes. Specifically, in the AM peak hour, the northbound right-turn volume is shown to decline from 308 existing vehicles to 14 vehicles in the 2028 Baseline scenario, a reduction of 294 vehicles. In the PM peak hour, that right-turn movement is reduced from 394 vehicles (existing) to 38 vehicles (2028 Baseline), a difference of 356 vehicles. The 2028 Baseline + Project right-turn volumes are even lower than the 2028 Baseline volumes, improbably suggesting that implementation of the ATMP Project will cause a reduction in traffic on that movement.

| <b>Table 3<br/>Traffic Volume Comparison<br/>I-405 Northbound Off-Ramp/Century Boulevard</b> |          |       |               |       |                             |      |                |                            |              |     |
|--|----------|-------|---------------|-------|-----------------------------|------|----------------|----------------------------|--------------|-----|
|  | Existing |       | 2028 Baseline |       | Base - Existing             |      | Base + Project |                            | Project Only |     |
|  | AM       | PM    | AM            | PM    | AM                          | PM   | AM             | PM                         | AM           | PM  |
| NBL  | 1,177    | 518   | 1,284         | 1,148 | 107                         | 630  | 1,310          | 1,163                      | 26           | 15  |
| NBR  | 308      | 394   | 14            | 38    | -294                        | -356 | 11             | 28                         | -3           | -10 |
| EBL  | 18       | 20    | 18            | 20    | 0                           | 0    | 18             | 20                         | 0            | 0   |
| EBT  | 510      | 1,750 | 1,152         | 2,056 | 642                         | 306  | 1,159          | 2,154                      | 7            | 98  |
| EBR  | 189      | 557   | 189           | 557   | 0                           | 0    | 189            | 557                        | 0            | 0   |
| WBT  | 1,652    | 790   | 1,968         | 1,479 | 316                         | 689  | 1,998          | 1,505                      | 30           | 26  |
| WBR  | 7        | 10    | 7             | 10    | 0                           | 0    | 7              | 10                         | 0            | 0   |
| NBL = Northbound Left Turn   |          |       |               |       | NBR = Northbound Right Turn |      |                |                            |              |     |
| EBL = Eastbound Left Turn  |          |       |               |       | EBT = Eastbound Thru        |      |                | EBR = Eastbound Right Turn |              |     |
| WBT = Westbound Thru   |          |       |               |       | WBR = Westbound Right Turn  |      |                |                            |              |     |

The only possible explanation for the reduction from Existing to 2028 Baseline conditions is that a significant roadway system modification is assumed that would divert traffic away from the northbound off-ramp; no such modification is described in the DEIR, however. Beyond this, it is difficult to imagine why addition of the ATMP Project traffic would result in a further reduction in the off-ramp volumes.

It is also difficult to understand why the northbound I-405 on-ramp volumes (i.e., EBR in the table) are unchanged in either the 2028 Baseline or Baseline + Project scenarios. Substantial growth is projected on the eastbound and westbound thru movements at the intersection. There is simply no rational explanation for these anomalies.

#### Validity of the Left-Turn Traffic Estimates

Review of the queue length calculation sheets in DEIR Appendix G (which are discussed in greater detail below) reveal that the Project is estimated to generate 26 left turns from the I-405 Northbound/Century Boulevard off-ramp in the AM peak hour and 15 such trips in the PM peak hour, as well as to cause questionable reductions in the number of off-ramp right turns.

To gain additional perspective with respect to the validity of the estimated left-turn volumes, we compared them to traffic generation information developed annually by LAWA. Each year, as a condition imposed by the City of Los Angeles, LAWA produces a report documenting the volume of traffic at LAX. The most recent version of that report provides data describing the volume of traffic entering and exiting the CTA in the AM peak hour, the midday peak hour, and the PM peak hour. In the peak month (i.e., August) of 2019, an average of 5,202 vehicles entered the CTA in the AM peak hour, 5,614 entered in the midday peak hour, and 4,909 did so in the PM peak hour. (Reference: Los Angeles World Airports, *Traffic Generation Report - Los Angeles International Airport / August 2019*, November 2019, p. 1.)

The Project-related left-turn volumes described above represent 0.5 percent of the existing inbound AM trips at the CTA and 0.3 percent of the corresponding PM peak hour trips. In contrast, the existing AM peak hour left-turn volume at the off-ramp (1,177 vehicles) represents 22.6 percent of the entering CTA traffic and the 518 existing PM peak hour left turns equate to 10.6 percent of the entering CTA traffic. While we recognize that not all of the off-ramp left turns are bound for the CTA, we believe this provides a reasonable indication that the estimated ATMP Project volumes are not valid, as they appear to understate the volume of ATMP Project-generated traffic at the off-ramp.

#### Reasonableness of the Queue Length Estimates

All of the queue length values (including for existing conditions) were derived from traffic analysis software. There is no indication that the existing queues reported in the DEIR were validated in the field to ensure that the software-generated queue lengths accurately reflect the actual queues. Thus, we have no meaningful assurance that any of the queue length estimates presented in the DEIR reflect reality.

#### Century Boulevard Operational Deficiencies

While not discussed in the DEIR, the queue length analysis worksheets reveal substantial operational deficiencies on Century Boulevard. In particular, the queue on the westbound Century Boulevard thru movement at the I-405 Northbound Off-ramp/Century Boulevard intersection is projected to be 662 feet (27 vehicles) long in the AM peak hour under 2028 Baseline Plus Project conditions. In the PM

peak hour, that queue would be 309 feet (13 vehicles) long. However, only approximately 200 feet exist between the subject intersection and the next intersection to the east (Century Boulevard/Felton Avenue). Thus, in both peak-hour periods, the Felton Avenue intersection would be blocked by westbound vehicles on Century Boulevard, as would several driveways serving private properties.

More importantly, perhaps, given the freeway-related intent of the analysis, the eastbound thru queue in the PM peak hour at this intersection would be 652 feet (27 vehicles) long, which would be sufficient to block access to the I-405 northbound on-ramp. (Perhaps this is the reason for the illogical lack of growth in the I-405 on-ramp traffic, as described above.)

### Flawed Interpretation of Analysis Results

We also note that the more-than-600-foot queue length estimates are shown on the analysis worksheet with a “#” symbol, which refers to a footnote stating, “95<sup>th</sup> percentile volume exceeds capacity, queue may be longer.” Thus, the situation might well be worse than described here, with even greater traffic obstructions prevailing.

### Obsolete Analysis Software

And, finally, we note that the queue length analysis was conducted using procedures documented in the year 2000 edition of the *Highway Capacity Manual* (HCM). The HCM, which is published by the Transportation Research Board (TRB) of the National Academies of Science, Engineering, and Medicine, is the primary resource with respect to matters associated with road capacity and intersection operations. Two editions of that document have been published since the 2000 version, one in 2010 and one in 2016. It is unclear why the analysts chose to use this outmoded version of the document to complete this analysis.

### Summary

The “freeway safety analysis” presented in the DEIR is highly flawed, to the point where the results are simply not credible. The analysis must be corrected, and the modified analysis must be incorporated into a revised DEIR and circulated for further public review.

9. **Cumulative Impacts** – The DEIR purports to provide an analysis of cumulative conditions, but this is questionable. The traffic analysis addresses the following analysis scenarios:
- Existing (2019),
  - Future Baseline (2028), and
  - Future Baseline (2028) With Project.

No Existing + Project scenario was considered, as the DEIR says that would be “misleading,” since the project will not be operational until 2028. Similarly, no analysis is presented for any scenario addressing a time frame beyond the anticipated 2028 Project implementation.

In justifying this approach, the DEIR states that the analysis, as presented, reflects completion of the ground transportation system improvements associated with the LAX Landside Access Modernization Program (LAMP) Phase 1 as well as the Airport Metro Connector 96<sup>th</sup> Street Transit Station (p. 4.8-61):

*As such, the baseline used for the transportation analysis already accounts for other transportation improvement projects, and the identification of impacts associated with the*

*currently proposed Project provides the basis to measure and evaluate cumulative impacts and assess whether the proposed Project has a cumulatively considerable contribution to the combined impacts.*

However, no support is presented that would provide reasonable assurance that the LAMP Phase 1 improvements will actually be complete by 2028. Unless such support can be provided, it is inappropriate to rely on a future baseline for the transportation analysis.

Moreover, the land use assumptions incorporated into the 2028 traffic estimates are unclear. The DEIR specifically refers to 123 cumulative projects (p. 4.8-35; Appendix G-7), but there is no discussion of those projects in the Cumulative Impacts section (beginning at DEIR p. 4.8-61). The volume of traffic associated with the 123 cumulative projects is presented at DEIR Appendix G.7. According to that table, those projects would generate almost 233,000 daily trips, almost 20,000 AM peak hour trips, and over 25,000 PM peak hour trips. Because the DEIR does not adequately describe the cumulative land use projects (i.e., how many of these cumulative land use projects will be implemented by 2028), it is not possible to verify the accuracy of the cumulative traffic estimates.

Furthermore, as noted above, no discussion is presented with regard to conditions beyond the 2028 implementation year. As described at DEIR p. 2-17, passenger demand at LAX is projected to increase to 110.8 million annual passengers (MAP) in fiscal year (FY) 2028 compared to 86.1 MAP in FY 2018, almost a 30 percent increase. Passenger activity in the year 2045 is projected to be 127.0 MAP, which represents roughly a 50 percent increase over existing conditions and a 15 percent increase over the 2028 Baseline. We would also note that these projections ignore the likely increases in activity at LAX that are directly attributable to the ATMP Project, as discussed earlier. The DEIR has completely failed to address the cumulative effects of these major increases in activity at LAX.

10. **Emergency Access** – The ATMP Project’s potential emergency access impacts were not addressed in the DEIR, as the Initial Study found that the ATMP Project would have a “Less Than Significant” impact. (DEIR, p. 4.8-2) The analysis of this issue, however, was restricted to the area in the immediate vicinity of the ATMP Project. It ignored anything beyond the boundaries of LAX.

Moreover, it focused almost exclusively on the construction period. As such, it failed to address the question of whether the traffic generated by the ATMP Project would result in congestion that would substantially impede the ability of emergency vehicles to respond to calls at or near LAX or to reach hospitals, either during the construction period or throughout the life of the ATMP Project.

11. **Parking Analysis** – Although the ATMP Project proposes construction of a parking structure at Terminal 9, no analysis is provided to determine whether the unknown number of additional parking spaces will be adequate to serve the newly-generated demand. As noted earlier, the number of parking spaces to be provided in the Terminal 9 structure is not stated in the DEIR.

The ATMP Project would also involve the acquisition of a number of properties, including existing parking facilities. No indication is provided, however, as to how many parking spaces exist on the properties to be acquired and how many, if any, will continue to be available to serve the parking demand generated by the ATMP Project. The DEIR should identify the net increase or decrease in the available parking supply following completion of the ATMP Project. Further, it must address how this compares to the parking demand generated by the ATMP Project and LAX as a whole.

12. **Analysis of Project Alternatives** – DEIR Chapter 5 presents the analysis of the ATMP Project alternatives. Four alternatives are addressed:



- Alternative 1: No Project,
- Alternative 2: Concourse 0 Only,
- Alternative 3: Terminal 9 Only, and
- Alternative 4: Approved LAMP Roadway Improvements plus Terminal 9 Access Alternative.

The VMT impacts associated with each alternative are addressed, although not in a consistent fashion. Specifically, for Alternatives 1, 3, and 4, the VMT impacts were evaluated based on running modified versions of the LAX Travel Demand Model, from which detailed VMT estimates were derived. In each case, this approach is identified as being “consistent with the methodology described in Section 4.8.2 for the proposed Project VMT analysis.” (DEIR, pp. 5-47, 5-77, and 5-92)

Inexplicably, however:

*An additional model run for Alternative 2 was not undertaken due to the similarity of this alternative (with the exception of Terminal 9, and the Terminal 9 APM station and parking facility) to the proposed Project.” (DEIR, p. 5-63)*

It is simply not credible to claim that the VMT impacts of Alternative 2 would be similar to those associated with the proposed ATMP Project. The “exceptions” described above are not inconsequential; in fact, they are major components of the ATMP Project. Terminal 9 would provide 12 – 18 new passenger gates within a 1,178,000-square-foot structure (DEIR, pp. 2-27 – 2-28). Approximately 3,225 employees (almost 70 percent of the ATMP Project total) would be required to operate Terminal 9, including 1,290 employees “for a typical 8- to 9-hour shift.” (DEIR, p. 4.8-11) In addition, the “exceptions” include the 700,000-square-foot Terminal 9 parking facility (DEIR, p. 2-28) and its unspecified number of new parking spaces, as well as the extensive system of roadways intended to serve Terminal 9 and its parking structure.

Given the massive reduction in project size associated with this alternative, it is completely inappropriate to fail to perform a quantitative analysis of its VMT impacts and, instead, to rely on a subjective, speculative determination as to those impacts. In short, no factual basis or support is provided with respect to the VMT impacts associated with Alternative 2.

**13. Various Unsupported Statements** – The DEIR presents as fact a number of statements that are unsupported by the transportation analysis. Examples include:

- *The types of improvements anticipated as part of the roadway system concept for the proposed Project would . . . provide the following additional benefits for traffic related to the CTA: . . . improvement of through-traffic flow for surrounding communities (i.e., vehicles on Sepulveda Boulevard that are not accessing the airport) by reducing traffic congestion on Sepulveda Boulevard. (DEIR, p. 2-39)*
- *The proposed roadway system would improve overall access to and from the CTA . . . (DEIR, p. 2-39)*
- *The proposed access improvements would help keep airport-related traffic congestion and back-up off public streets. (DEIR, p. 2-10)*

These statements can only be supported through the completion of quantitative level of service analyses, as described above. The DEIR must be revised to incorporate such analyses and the revised document must then be recirculated for further public review.

**CONCLUSION**

Our review of the Draft Environmental Impact Report completed in connection with the proposed Airfield and Terminal Modernization Project at Los Angeles International Airport (LAX) in Los Angeles, California revealed a number of issues regarding the adequacy of the transportation analysis. The deficiencies we have identified raise significant questions as to the validity of the conclusions presented in the DEIR with respect to ATMP Project-related impacts.

Of particular concern is the apparent failure of the environmental analysis to accurately assess the impacts of the ATMP Project with respect to vehicle-miles-traveled. Our analysis indicated that, when the detailed layout of the Central Terminal Area road system is carefully evaluated, the Project-related passenger VMT will be substantially greater than is indicated in the DEIR.

We also believe that the DEIR is deficient due to its failure to include any analysis of Project-related construction impacts. In that regard, we have proposed several measures intended to give the neighboring City of El Segundo a voice in establishing construction haul routes and generally guiding and monitoring construction activities.

We further believe that it is incumbent upon LAWA to perform roadway operations analyses at a sufficient level of detail as to reveal impacts of the Project on traffic operations in nearby jurisdictions, particularly in El Segundo. And the freeway safety analysis presented in the DEIR must be revised to correct the obvious problems with the traffic volumes employed in the calculations.

These issues must be addressed prior to approval of the proposed project and its environmental documentation.

We hope this information is useful. If you have questions concerning any of the items presented here or would like to discuss them further, please feel free to contact me at (906) 847-8276.

Sincerely,

**GRIFFIN COVE TRANSPORTATION CONSULTING, PLLC**



Neal K. Liddicoat, P.E.  
Principal

Attachments

**ATTACHMENT A**

**Figure A-1  
To/From Sepulveda Blvd. South  
LAMP Phase 1 Road System**

**&**

**Figure A-2  
To/From Sepulveda Blvd. South  
ATMP Road System**

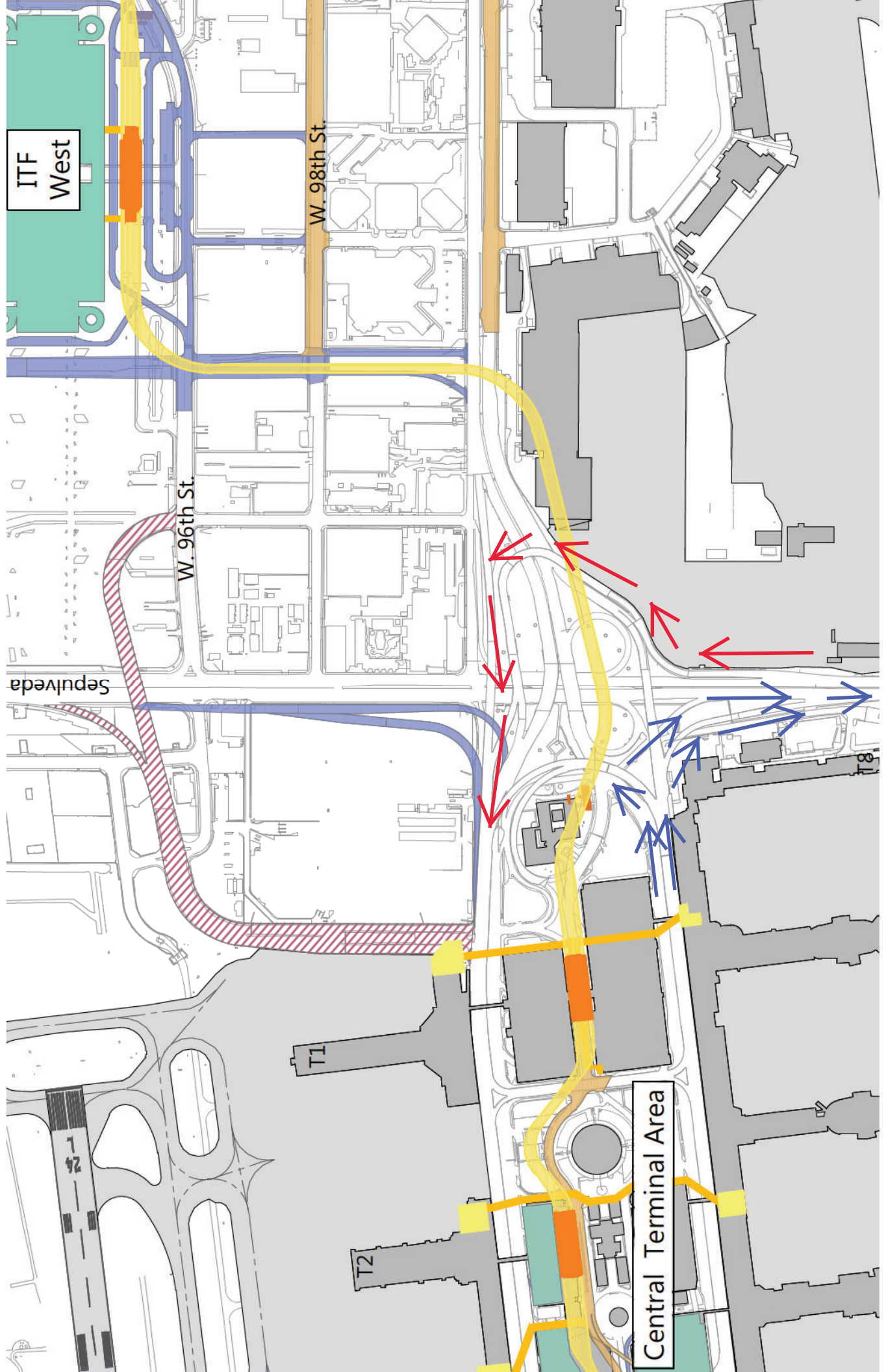


Figure A-1  
To/From Sepulveda Blvd. South  
LAMP Phase 1 Road System

Figure A-1  
To/From Sepulveda Blvd. South  
ATMP Road System

ATMP-AL010

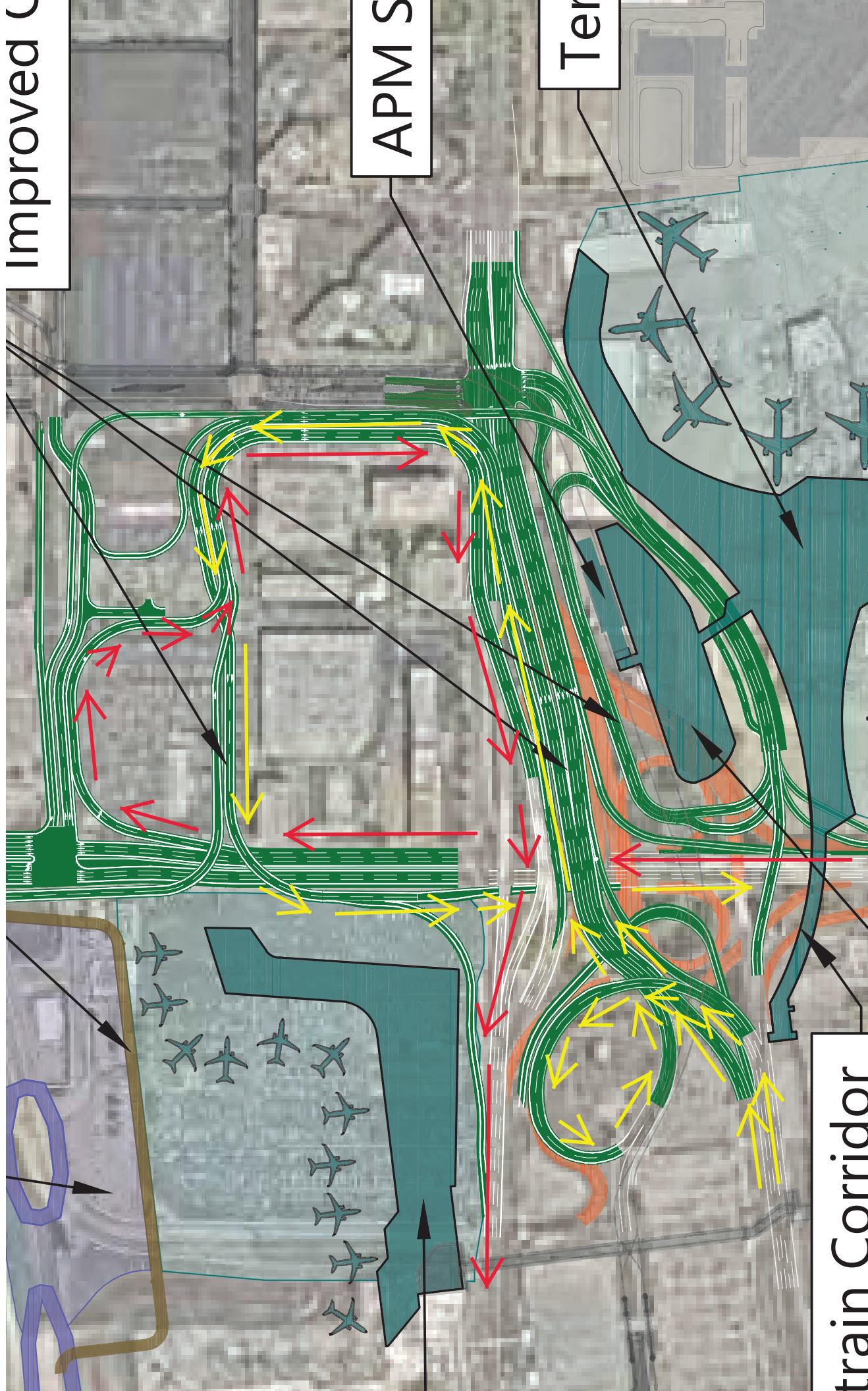


Figure A-2  
To/From Sepulveda Blvd. South  
ATMP Road System

**ATTACHMENT B**

**Figure B-1  
To/From Sepulveda Blvd. North  
LAMP Phase 1 Road System**

**&**

**Figure B-2  
To/From Sepulveda Blvd. North  
ATMP Road System**

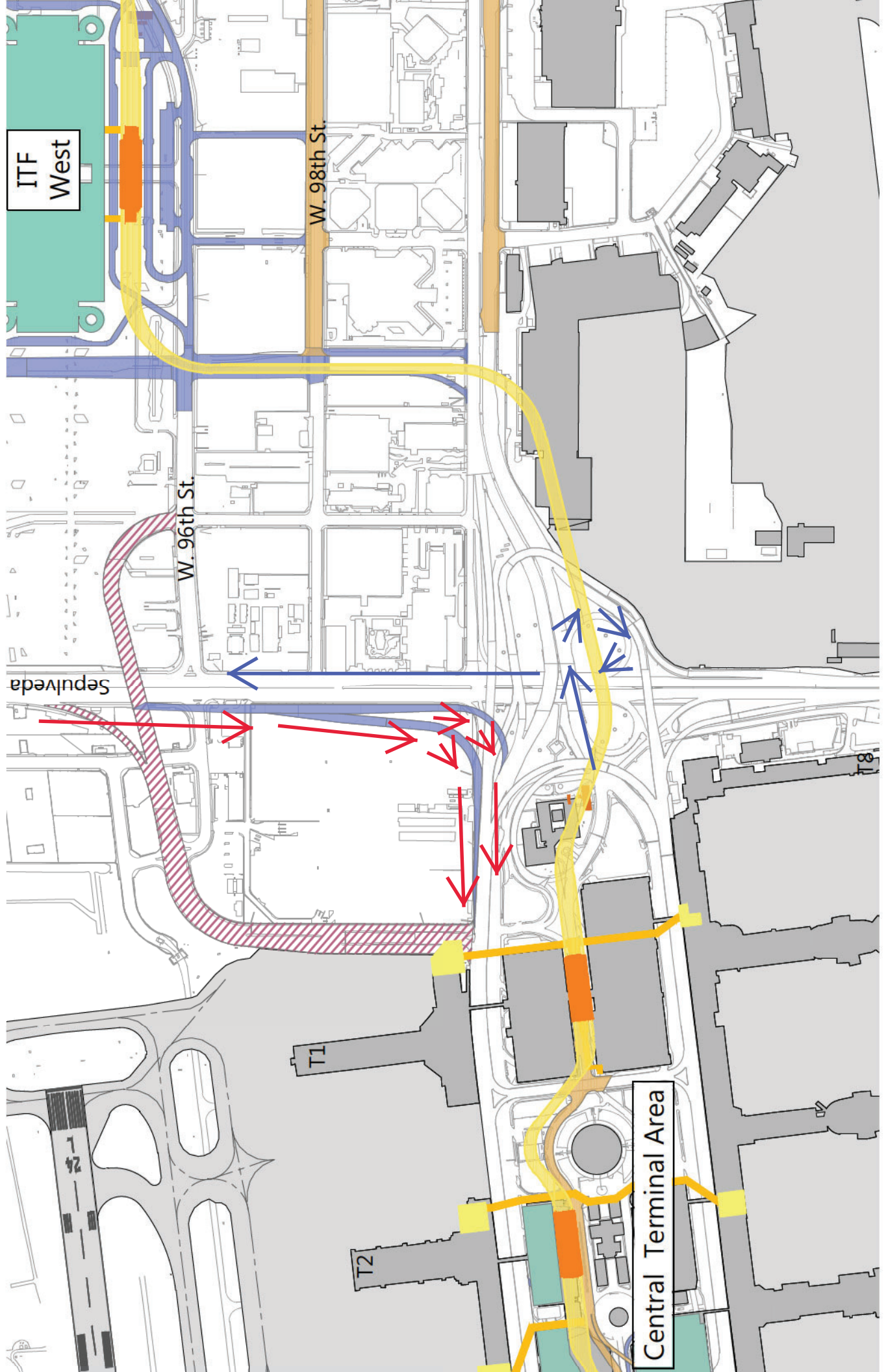
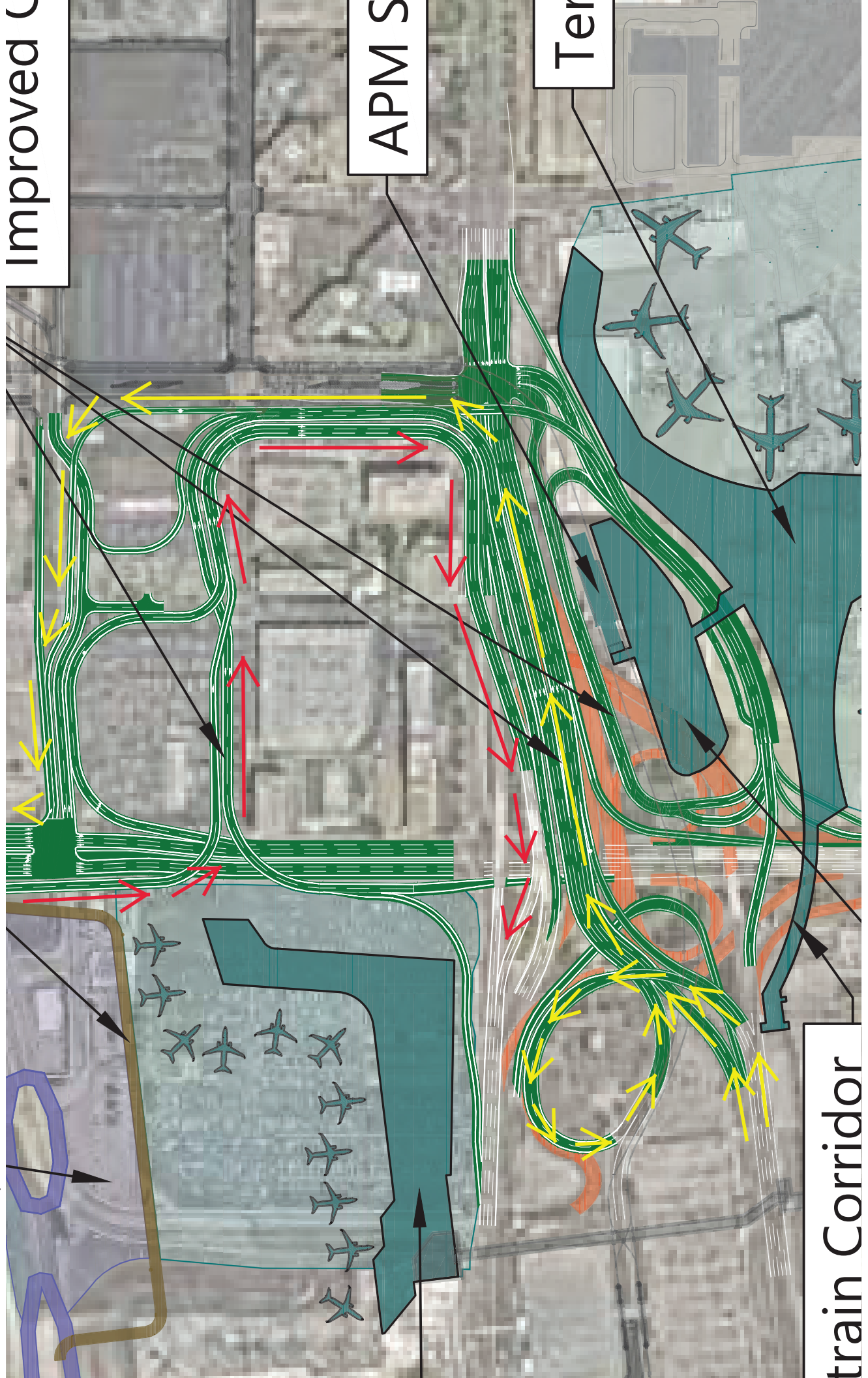


Figure B-1  
To/From Sepulveda Blvd. North  
LAMP Phase 1 Road System

Figure B-2  
To/From Sepulveda Blvd. North  
ATMP Road System

ATMP-AL010





**ATTACHMENT C**

**DEIR Table G.4-7 (“Summary of 2028 Proposed Project  
Terminal 1 to Terminal 8 Hourly Volumes – Lower Level”)**

**&**

**DEIR Table G.4-8 (“Summary of 2028 Proposed Project  
Terminal 1 to Terminal 8 Hourly Volumes – Upper Level”)**

**(Source: Los Angeles World Airports, *Airfield and Terminal Modernization Project – Los Angeles International Airport (LAX) – Draft Environmental Impact Report (Draft EIR)*, October 2020.)**

**&**

**Tables C-1 – C-5**

**2028 Design Day Traffic Calculation Spreadsheets**

**(Source: Griffin Cove Transportation Consulting, PLLC)**

Table G.4-7  
Summary of 2028 Proposed Project Terminal 1 to Terminal 8 Hourly Volumes – Lower Level

| Vehicle Volumes                                  | 12:00        |            | 1:00      |          | 2:00     |          | 3:00     |          | 4:00     |          | 5:00     |          | 6:00     |          | 7:00     |          | 8:00     |          | 9:00     |          | 10:00    |          | 11:00    |          |
|--|--------------|------------|-----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
|  | AM           | PM         | AM        | PM       | AM       | PM       | AM       | PM       | AM       | PM       | AM       | PM       | AM       | PM       | AM       | PM       | AM       | PM       | AM       | PM       | AM       | PM       | AM       | PM       |
| Private Vehicle - Pick-Up/Drop-Off               | 727          | 110        | 50        | 7        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Private Vehicle - CTA Parking                    | 135          | 19         | 7         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Charter Van                                      | 0            | 0          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Taxi   | 35           | 5          | 1         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Transportation Networking Company                | 140          | 21         | 3         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Limo/Town Car                                    | 18           | 3          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Shared Ride Van                                  | 0            | 0          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Rental Shuttle                                   | 0            | 0          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Hotel Shuttle                                    | 0            | 0          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Parking Shuttle                                  | 0            | 0          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| FlyAway  | 0            | 0          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Charter Bus                                      | 0            | 0          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Transit  | 0            | 0          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Crew   | 14           | 2          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| LAWA Shuttles                                    | 0            | 0          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| <b>CTA Lower Level Ins</b>                       | <b>1,069</b> | <b>160</b> | <b>61</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> |
| Commercial From Upper Level                      | 0            | 0          | 0         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Sepulveda Boulevard SB                           | 378          | 57         | 22        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Century Boulevard                                | 429          | 58         | 23        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Sepulveda Boulevard NB                           | 263          | 45         | 17        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| <b>CTA Lower Level Outs</b>                      | <b>1,634</b> | <b>237</b> | <b>86</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> | <b>0</b> |
| Sepulveda Boulevard NB                           | 82           | 16         | 7         | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Century Boulevard                                | 783          | 122        | 44        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| Sepulveda Boulevard SB                           | 769          | 99         | 35        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |
| <b>Other CTA Vehicle Assignments<sup>1</sup></b> |              |            |           |          |          |          |          |          |          |          |          |          |          |          |          |          |          |          |          |          |          |          |          |          |
| Parking Net <sup>2</sup>                         | 565          | 77         | 25        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        | 0        |

Note:  
 1. Vehicle volumes included in Vehicle Volume counts above.  
 2. (Negative) value indicated more vehicles leaving parking than entering during hour.  
 NB = northbound SB = southbound  
 Source: Ricondo & Associates, Inc., May 2020.

Table G.4-8  
Summary of 2028 Proposed Project Terminal 1 to Terminal 8 Hourly Volumes – Upper Level

| Vehicle Volumes                                  | 12:00 AM  |           | 1:00 AM    |            | 2:00 AM      |              | 3:00 AM      |              | 4:00 AM      |              | 5:00 AM      |              | 6:00 AM      |              | 7:00 AM      |              | 8:00 AM      |              | 9:00 AM      |              | 10:00 AM     |              | 11:00 AM   |            |
|--|-----------|-----------|------------|------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|--------------|------------|------------|
|  | AM        | PM        | AM         | PM         | AM           | PM           | AM           | PM           | AM           | PM           | AM           | PM           | AM           | PM           | AM           | PM           | AM           | PM           | AM           | PM           | AM           | PM           | AM         | PM         |
| Private Vehicle - Pick-Up/Drop-Off               | 15        | 20        | 116        | 397        | 905          | 1,189        | 1,447        | 1,614        | 1,604        | 711          | 715          | 671          | 655          | 638          | 613          | 605          | 553          | 823          | 736          | 828          | 920          | 867          | 517        | 206        |
| Private Vehicle - CTA Parking                    | 1         | 1         | 4          | 39         | 85           | 120          | 133          | 179          | 176          | 87           | 112          | 101          | 98           | 101          | 94           | 80           | 76           | 109          | 88           | 127          | 159          | 168          | 105        | 0          |
| Charter Van                                      | 0         | 0         | 0          | 0          | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0          | 0          |
| Taxi   | 0         | 0         | 2          | 7          | 17           | 21           | 26           | 29           | 28           | 12           | 11           | 11           | 10           | 10           | 10           | 10           | 9            | 5            | 5            | 5            | 7            | 6            | 4          | 1          |
| Transportation Networking Company                | 10        | 13        | 120        | 411        | 938          | 1,232        | 1,500        | 1,672        | 1,662        | 1,120        | 1,126        | 1,057        | 1,032        | 1,006        | 966          | 952          | 871          | 515          | 461          | 518          | 576          | 541          | 324        | 128        |
| Limo/Town Car                                    | 1         | 1         | 2          | 6          | 15           | 19           | 24           | 26           | 25           | 69           | 69           | 66           | 63           | 62           | 60           | 59           | 54           | 52           | 46           | 52           | 58           | 54           | 33         | 13         |
| Shared Ride Van                                  | 0         | 0         | 0          | 0          | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0          |            |
| Rental Shuttle                                   | 0         | 0         | 0          | 0          | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0          |            |
| Hotel Shuttle                                    | 0         | 0         | 0          | 0          | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0          |            |
| Parking Shuttle                                  | 0         | 0         | 0          | 0          | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0          |            |
| FlyAway  | 0         | 0         | 0          | 2          | 3            | 5            | 5            | 5            | 5            | 3            | 4            | 4            | 4            | 4            | 4            | 4            | 3            | 4            | 3            | 3            | 3            | 3            | 2          | 1          |
| Charter Bus                                      | 0         | 0         | 0          | 0          | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0          |            |
| Transit  | 0         | 0         | 0          | 0          | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0          |            |
| Crew   | 1         | 0         | 0          | 0          | 1            | 1            | 1            | 1            | 1            | 10           | 10           | 10           | 9            | 9            | 9            | 9            | 8            | 16           | 13           | 16           | 17           | 16           | 9          | 4          |
| LAWA Shuttles                                    | 0         | 0         | 0          | 0          | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0            | 0          |            |
| <b>CTA Upper Level Ins</b>                       | <b>28</b> | <b>35</b> | <b>244</b> | <b>862</b> | <b>1,964</b> | <b>2,587</b> | <b>3,136</b> | <b>3,526</b> | <b>3,501</b> | <b>2,012</b> | <b>2,047</b> | <b>1,920</b> | <b>1,871</b> | <b>1,830</b> | <b>1,756</b> | <b>1,719</b> | <b>1,574</b> | <b>1,524</b> | <b>1,352</b> | <b>1,549</b> | <b>1,740</b> | <b>1,655</b> | <b>994</b> | <b>353</b> |
| Sepulveda Boulevard SB                           | 20        | 24        | 132        | 268        | 720          | 1,072        | 1,426        | 1,863        | 2,242        | 1,276        | 1,084        | 1,018        | 1,014        | 943          | 910          | 818          | 783          | 820          | 676          | 758          | 835          | 820          | 520        | 213        |
| Century Boulevard                                | 4         | 6         | 56         | 170        | 322          | 386          | 553          | 847          | 684          | 411          | 548          | 519          | 482          | 458          | 377          | 339          | 237          | 215          | 218          | 419          | 511          | 482          | 252        | 59         |
| Sepulveda Boulevard NB                           | 4         | 5         | 56         | 424        | 922          | 1,129        | 1,157        | 816          | 575          | 325          | 416          | 383          | 375          | 429          | 468          | 562          | 554          | 489          | 458          | 372          | 394          | 353          | 222        | 81         |
| <b>CTA Upper Level Outs</b>                      | <b>27</b> | <b>34</b> | <b>240</b> | <b>823</b> | <b>1,879</b> | <b>2,467</b> | <b>3,003</b> | <b>3,347</b> | <b>3,325</b> | <b>1,925</b> | <b>1,935</b> | <b>1,819</b> | <b>1,773</b> | <b>1,729</b> | <b>1,662</b> | <b>1,639</b> | <b>1,498</b> | <b>1,415</b> | <b>1,264</b> | <b>1,422</b> | <b>1,581</b> | <b>1,487</b> | <b>889</b> | <b>353</b> |
| Sepulveda Boulevard NB                           | 6         | 7         | 62         | 274        | 616          | 724          | 1,015        | 1,033        | 1,059        | 568          | 548          | 544          | 546          | 519          | 481          | 490          | 432          | 405          | 372          | 406          | 436          | 406          | 220        | 75         |
| Century Boulevard                                | 6         | 10        | 55         | 226        | 485          | 735          | 896          | 1,071        | 980          | 532          | 523          | 484          | 493          | 558          | 486          | 478          | 475          | 445          | 406          | 629          | 714          | 630          | 303        | 83         |
| Sepulveda Boulevard SB                           | 15        | 17        | 122        | 323        | 778          | 1,009        | 1,092        | 1,243        | 1,286        | 825          | 863          | 791          | 734          | 652          | 696          | 671          | 590          | 565          | 486          | 387          | 431          | 451          | 366        | 195        |
| <b>Other CTA Vehicle Assignments<sup>1</sup></b> |           |           |            |            |              |              |              |              |              |              |              |              |              |              |              |              |              |              |              |              |              |              |            |            |
| Parking Entries                                  | 1         | 1         | 4          | 39         | 85           | 120          | 133          | 179          | 176          | 87           | 112          | 101          | 98           | 101          | 94           | 80           | 76           | 109          | 88           | 127          | 159          | 168          | 105        | 0          |

Note:

<sup>1</sup> Vehicle volumes included in Vehicle Volume counts above.

NB = northbound SB = southbound

Source: Ricondo & Associates, Inc., May 2020.

**TABLE C-1**  
**FROM EL SEGUNDO TO THE CTA VIA NORTHBOUND SEPULVEDA BLVD.**  
**2028 DESIGN DAY**

| <u>TIME</u>  | <u>LOWER LEVEL</u> | <u>UPPER LEVEL</u> | <u>TOTAL</u>  |
|--------------|--------------------|--------------------|---------------|
| 12:00 AM     | 263                | 4                  | 267           |
| 1:00 AM      | 45                 | 5                  | 50            |
| 2:00 AM      | 17                 | 56                 | 73            |
| 3:00 AM      | 0                  | 424                | 424           |
| 4:00 AM      | 0                  | 922                | 922           |
| 5:00 AM      | 234                | 1,129              | 1,363         |
| 6:00 AM      | 306                | 1,157              | 1,463         |
| 7:00 AM      | 542                | 816                | 1,358         |
| 8:00 AM      | 448                | 575                | 1,023         |
| 9:00 AM      | 624                | 325                | 949           |
| 10:00 AM     | 679                | 416                | 1,095         |
| 11:00 AM     | 675                | 383                | 1,058         |
| 12:00 PM     | 746                | 375                | 1,121         |
| 1:00 PM      | 580                | 429                | 1,009         |
| 2:00 PM      | 672                | 468                | 1,140         |
| 3:00 PM      | 850                | 562                | 1,412         |
| 4:00 PM      | 900                | 554                | 1,454         |
| 5:00 PM      | 689                | 489                | 1,178         |
| 6:00 PM      | 697                | 458                | 1,155         |
| 7:00 PM      | 637                | 372                | 1,009         |
| 8:00 PM      | 576                | 394                | 970           |
| 9:00 PM      | 376                | 353                | 729           |
| 10:00 PM     | 391                | 222                | 613           |
| 11:00 PM     | 502                | 81                 | 583           |
| <b>TOTAL</b> | <b>11,449</b>      | <b>10,969</b>      | <b>22,418</b> |

**TABLE C-2**  
**FROM THE CTA TO EL SEGUNDO VIA SOUTHBOUND SEPULVEDA BLVD.**  
**2028 DESIGN DAY**

| <u>TIME</u>  | <u>LOWER LEVEL</u> | <u>UPPER LEVEL</u> | <u>TOTAL</u>  |
|--------------|--------------------|--------------------|---------------|
| 12:00 AM     | 769                | 15                 | 784           |
| 1:00 AM      | 99                 | 17                 | 116           |
| 2:00 AM      | 35                 | 122                | 157           |
| 3:00 AM      | 0                  | 323                | 323           |
| 4:00 AM      | 0                  | 778                | 778           |
| 5:00 AM      | 118                | 1,009              | 1,127         |
| 6:00 AM      | 166                | 1,092              | 1,258         |
| 7:00 AM      | 655                | 1,243              | 1,898         |
| 8:00 AM      | 505                | 1,286              | 1,791         |
| 9:00 AM      | 962                | 825                | 1,787         |
| 10:00 AM     | 1,062              | 863                | 1,925         |
| 11:00 AM     | 1,229              | 791                | 2,020         |
| 12:00 PM     | 1,259              | 734                | 1,993         |
| 1:00 PM      | 931                | 652                | 1,583         |
| 2:00 PM      | 948                | 696                | 1,644         |
| 3:00 PM      | 1,178              | 671                | 1,849         |
| 4:00 PM      | 1,217              | 590                | 1,807         |
| 5:00 PM      | 939                | 565                | 1,504         |
| 6:00 PM      | 1,014              | 486                | 1,500         |
| 7:00 PM      | 822                | 387                | 1,209         |
| 8:00 PM      | 929                | 431                | 1,360         |
| 9:00 PM      | 872                | 451                | 1,323         |
| 10:00 PM     | 1,109              | 366                | 1,475         |
| 11:00 PM     | 1,084              | 195                | 1,279         |
| <b>TOTAL</b> | <b>17,902</b>      | <b>14,588</b>      | <b>32,490</b> |

**TABLE C-3**  
**FROM CTA UPPER LEVEL LOOP TO NORTHBOUND & SOUTHBOUND SEPULVEDA BLVD.**  
**2028 DESIGN DAY**

| <u>TIME</u>  | <u>SB SEPULVEDA</u> | <u>NB SEPULVEDA</u> | <u>TOTAL</u>  |
|--------------|---------------------|---------------------|---------------|
| 12:00 AM     | 15                  | 6                   | 21            |
| 1:00 AM      | 17                  | 7                   | 24            |
| 2:00 AM      | 122                 | 62                  | 184           |
| 3:00 AM      | 323                 | 274                 | 597           |
| 4:00 AM      | 778                 | 616                 | 1,394         |
| 5:00 AM      | 1,009               | 724                 | 1,733         |
| 6:00 AM      | 1,092               | 1,015               | 2,107         |
| 7:00 AM      | 1,243               | 1,033               | 2,276         |
| 8:00 AM      | 1,286               | 1,059               | 2,345         |
| 9:00 AM      | 825                 | 568                 | 1,393         |
| 10:00 AM     | 863                 | 548                 | 1,411         |
| 11:00 AM     | 791                 | 544                 | 1,335         |
| 12:00 PM     | 734                 | 546                 | 1,280         |
| 1:00 PM      | 652                 | 519                 | 1,171         |
| 2:00 PM      | 696                 | 481                 | 1,177         |
| 3:00 PM      | 671                 | 490                 | 1,161         |
| 4:00 PM      | 590                 | 432                 | 1,022         |
| 5:00 PM      | 565                 | 405                 | 970           |
| 6:00 PM      | 486                 | 372                 | 858           |
| 7:00 PM      | 387                 | 406                 | 793           |
| 8:00 PM      | 431                 | 436                 | 867           |
| 9:00 PM      | 451                 | 406                 | 857           |
| 10:00 PM     | 366                 | 220                 | 586           |
| 11:00 PM     | 195                 | 75                  | 270           |
| <b>TOTAL</b> | <b>14,588</b>       | <b>11,244</b>       | <b>25,832</b> |

**TABLE C-4**  
**FROM SOUTHBOUND SEPULVEDA BLVD. TO CTA**  
**2028 DESIGN DAY**

| <u>TIME</u>  | <u>LOWER LEVEL</u> | <u>UPPER LEVEL</u> | <u>TOTAL</u>  |
|--------------|--------------------|--------------------|---------------|
| 12:00 AM     | 378                | 20                 | 398           |
| 1:00 AM      | 57                 | 24                 | 81            |
| 2:00 AM      | 22                 | 132                | 154           |
| 3:00 AM      | 0                  | 268                | 268           |
| 4:00 AM      | 0                  | 720                | 720           |
| 5:00 AM      | 178                | 1,072              | 1,250         |
| 6:00 AM      | 310                | 1,426              | 1,736         |
| 7:00 AM      | 855                | 1,863              | 2,718         |
| 8:00 AM      | 692                | 2,242              | 2,934         |
| 9:00 AM      | 1,056              | 1,276              | 2,332         |
| 10:00 AM     | 1,200              | 1,084              | 2,284         |
| 11:00 AM     | 1,180              | 1,018              | 2,198         |
| 12:00 PM     | 1,206              | 1,014              | 2,220         |
| 1:00 PM      | 1,021              | 943                | 1,964         |
| 2:00 PM      | 1,069              | 910                | 1,979         |
| 3:00 PM      | 1,274              | 818                | 2,092         |
| 4:00 PM      | 1,386              | 783                | 2,169         |
| 5:00 PM      | 992                | 820                | 1,812         |
| 6:00 PM      | 1,046              | 676                | 1,722         |
| 7:00 PM      | 972                | 758                | 1,730         |
| 8:00 PM      | 1,051              | 835                | 1,886         |
| 9:00 PM      | 925                | 820                | 1,745         |
| 10:00 PM     | 1,017              | 520                | 1,537         |
| 11:00 PM     | 567                | 213                | 780           |
| <b>TOTAL</b> | <b>18,454</b>      | <b>20,255</b>      | <b>38,709</b> |

**TABLE C-5  
FROM THE CTA TO NORTHBOUND SEPULVEDA BLVD.  
2028 DESIGN DAY**

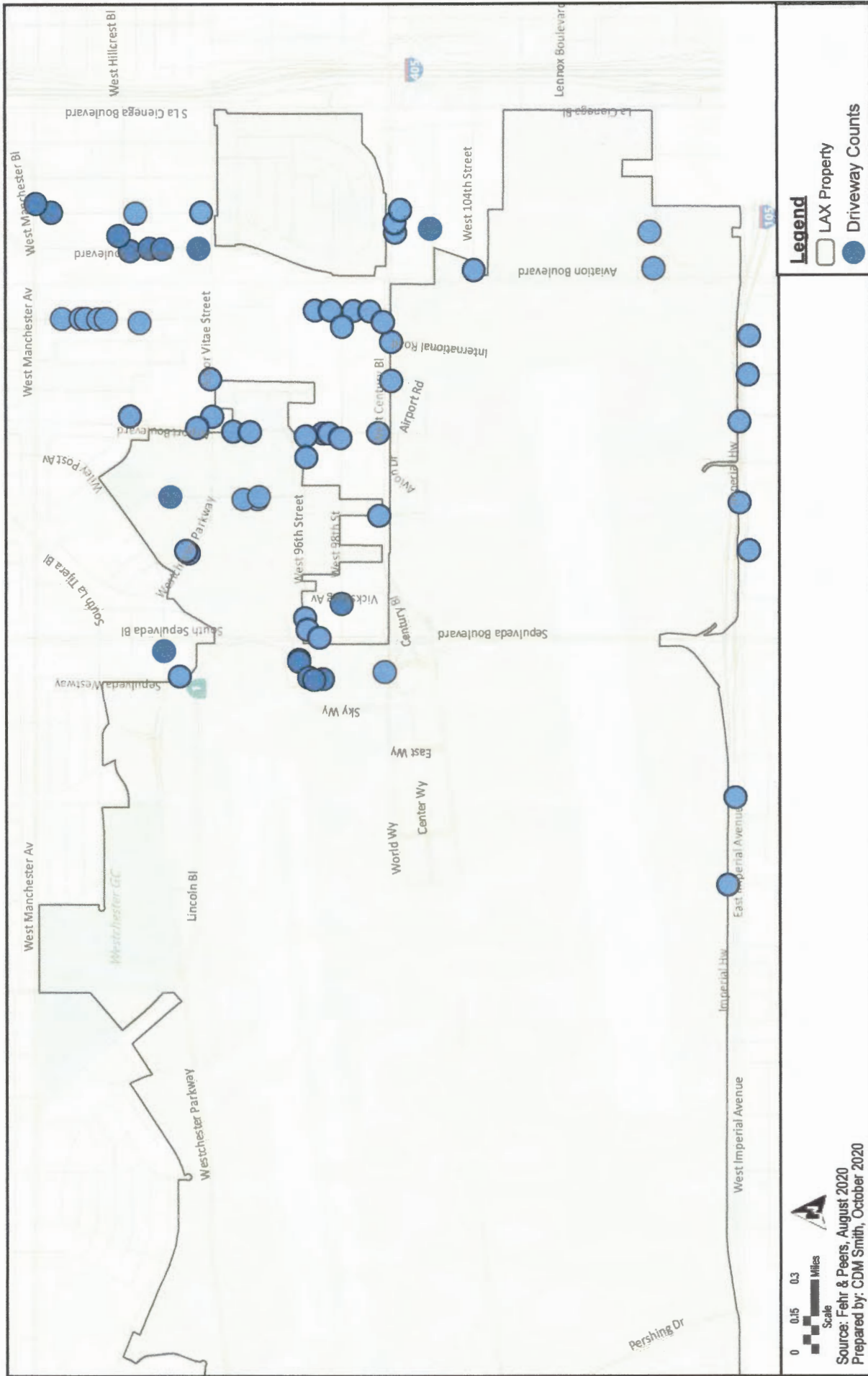
| <u>TIME</u>  | <u>LOWER LEVEL</u> | <u>UPPER LEVEL</u> | <u>TOTAL</u>  |
|--------------|--------------------|--------------------|---------------|
| 12:00 AM     | 82                 | 6                  | 88            |
| 1:00 AM      | 16                 | 7                  | 23            |
| 2:00 AM      | 7                  | 62                 | 69            |
| 3:00 AM      | 0                  | 274                | 274           |
| 4:00 AM      | 0                  | 616                | 616           |
| 5:00 AM      | 101                | 724                | 825           |
| 6:00 AM      | 171                | 1,015              | 1,186         |
| 7:00 AM      | 341                | 1,033              | 1,374         |
| 8:00 AM      | 257                | 1,059              | 1,316         |
| 9:00 AM      | 313                | 568                | 881           |
| 10:00 AM     | 343                | 548                | 891           |
| 11:00 AM     | 353                | 544                | 897           |
| 12:00 PM     | 397                | 546                | 943           |
| 1:00 PM      | 295                | 519                | 814           |
| 2:00 PM      | 319                | 481                | 800           |
| 3:00 PM      | 452                | 490                | 942           |
| 4:00 PM      | 443                | 432                | 875           |
| 5:00 PM      | 267                | 405                | 672           |
| 6:00 PM      | 244                | 372                | 616           |
| 7:00 PM      | 271                | 406                | 677           |
| 8:00 PM      | 298                | 436                | 734           |
| 9:00 PM      | 2,687              | 406                | 3,093         |
| 10:00 PM     | 283                | 220                | 503           |
| 11:00 PM     | 149                | 75                 | 224           |
| <b>TOTAL</b> | <b>8,089</b>       | <b>11,244</b>      | <b>19,333</b> |



**ATTACHMENT D**

**DEIR Figure 4.8-3  
Driveway Count Locations**

**(Source: Los Angeles World Airports, *Airfield and Terminal Modernization Project – Los Angeles International Airport (LAX) – Draft Environmental Impact Report (Draft EIR)*, October 2020.)**



LAX Airfield and Terminal Modernization Project

Driveway Count Locations

Figure 4.8-3

**ATTACHMENT E**

**Intersection Level of Service Summary Tables – City of El Segundo**  
**AM Peak Hour**  
**Midday Peak Hour**  
**PM Peak Hour**

**(Reference: Raju Associates, Inc., *Draft Transportation Study for the  
Landside Access Modernization Program DEIR*, September, 2016)**

| Table 1<br>Intersection Level of Service Summary<br>AM Peak Hour |                  |                  |                                 |     |                                |     |                             |     |                                |     |                             |     |   |     |
|--|------------------|------------------|---------------------------------|-----|--------------------------------|-----|-----------------------------|-----|--------------------------------|-----|-----------------------------|-----|---|-----|
| Intersection   | Baseline (2015)  |                  | Baseline (2015)<br>With Project |     | 2024 Future<br>Without Project |     | 2024 Future<br>With Project |     | 2025 Future<br>Without Project |     | 2025 Future<br>With Project |     | 2025 Future<br>With Project<br>and Potential<br>Future<br>Development |     |
|  | V/C <sup>1</sup> | LOS <sup>2</sup> | V/C                             | LOS | V/C                            | LOS | V/C                         | LOS | V/C                            | LOS | V/C                         | LOS | V/C   | LOS |
| 4. Vista del Mar/Grand Ave.                                      | 0.638            | B                | 0.631                           | B   | 0.689                          | B   | 0.682                       | B   | 0.713                          | C   | 0.706                       | C   | 0.706   | C   |
| 11. Main St./Imperial Hwy.                                       | 0.693            | B                | 0.689                           | B   | 0.685                          | B   | 0.686                       | B   | 0.694                          | B   | 0.701                       | C   | 0.702   | C   |
| 67. Sepulveda Blvd./Imperial Hwy.                                | 0.774            | C                | 0.719                           | C   | 0.769                          | C   | 0.712                       | C   | 0.792                          | C   | 0.733                       | C   | 0.735   | C   |
| 68. Sepulveda Blvd./Mariposa Ave.                                | 0.748            | C                | 0.746                           | C   | 0.886                          | D   | 0.882                       | D   | 0.888                          | D   | 0.888                       | D   | 0.889   | D   |
| 69. Sepulveda Blvd./Grand Ave.                                   | 0.820            | D                | 0.822                           | D   | 1.146                          | F   | 1.144                       | F   | 1.146                          | F   | 1.149                       | F   | 1.150   | F   |
| 70. Sepulveda Blvd./El Segundo Blvd.                             | 0.815            | D                | 0.817                           | D   | 0.840                          | D   | 0.844                       | D   | 0.848                          | D   | 0.850                       | D   | 0.851   | D   |
| 71. Sepulveda Blvd./Rosecrans Ave.                               | 0.937            | E                | 0.937                           | E   | 1.046                          | F   | 1.044                       | F   | 1.056                          | F   | 1.053                       | F   | 1.054   | F   |
| 85. Nash St./I-105 WB Ramps/Imperial Hwy.                        | 0.414            | A                | 0.403                           | A   | 0.521                          | A   | 0.520                       | A   | 0.547                          | A   | 0.549                       | A   | 0.551   | A   |
| 86. Nash St./El Segundo Blvd.                                    | 0.551            | A                | 0.545                           | A   | 0.635                          | B   | 0.631                       | B   | 0.646                          | B   | 0.642                       | B   | 0.642   | B   |
| 87. Douglas St./ Imperial Hwy.                                   | 0.346            | A                | 0.349                           | A   | 0.369                          | A   | 0.403                       | A   | 0.398                          | A   | 0.438                       | A   | 0.439   | A   |
| 88. Douglas St./El Segundo Blvd.                                 | 0.736            | C                | 0.731                           | C   | 0.830                          | D   | 0.826                       | D   | 0.848                          | D   | 0.855                       | D   | 0.858   | D   |
| 97. Aviation Blvd./Imperial Hwy.                                 | 0.576            | A                | 0.538                           | A   | 0.724                          | C   | 0.602                       | B   | 0.878                          | D   | 0.652                       | B   | 0.664   | B   |
| 98. Aviation Blvd./West 120 <sup>th</sup> St.                    | 0.856            | D                | 0.834                           | D   | 0.821                          | D   | 0.814                       | D   | 0.905                          | E   | 0.869                       | D   | 0.874   | D   |
| 99. Aviation Blvd./El Segundo Blvd.                              | 0.863            | D                | 0.854                           | D   | 0.971                          | E   | 0.969                       | E   | 0.991                          | E   | 0.987                       | E   | 0.992   | E   |
| 100. Aviation Blvd./Rosecrans Ave.                               | 0.946            | E                | 0.943                           | E   | 1.001                          | F   | 0.998                       | E   | 1.013                          | F   | 1.010                       | F   | 1.012   | F   |

Notes:

<sup>1</sup> Volume/capacity.

<sup>2</sup> Level of service.

| Table 2<br>Intersection Level of Service Summary<br>Midday Peak Hour |                  |                  |                                 |     |                                |     |                             |     |                                |     |                             |     |   |     |
|--|------------------|------------------|---------------------------------|-----|--------------------------------|-----|-----------------------------|-----|--------------------------------|-----|-----------------------------|-----|---|-----|
| Intersection   | Baseline (2015)  |                  | Baseline (2015)<br>With Project |     | 2024 Future<br>Without Project |     | 2024 Future<br>With Project |     | 2035 Future<br>Without Project |     | 2035 Future<br>With Project |     | 2035 Future<br>With Project<br>and Potential<br>Development |     |
|  | V/C <sup>1</sup> | LOS <sup>2</sup> | V/C                             | LOS | V/C                            | LOS | V/C                         | LOS | V/C                            | LOS | V/C                         | LOS | V/C   | LOS |
| 67. Sepulveda Blvd./Imperial Hwy.                                    | 0.684            | B                | 0.654                           | B   | 0.632                          | B   | 0.632                       | B   | 0.647                          | B   | 0.658                       | B   | 0.659   | B   |
| 97. Aviation Blvd./Imperial Hwy.                                     | 0.517            | A                | 0.429                           | A   | 0.667                          | B   | 0.622                       | B   | 0.694                          | B   | 0.640                       | B   | 0.645   | B   |

Notes:

<sup>1</sup> Volume/capacity.

<sup>2</sup> Level of service.

| Table 3<br>Intersection Level of Service Summary<br>PM Peak Hour |                  |                  |                              |     |                             |     |                          |     |                             |     |                          |     |   |     |
|--|------------------|------------------|------------------------------|-----|-----------------------------|-----|--------------------------|-----|-----------------------------|-----|--------------------------|-----|---|-----|
| Intersection   | Baseline (2015)  |                  | Baseline (2015) With Project |     | 2024 Future Without Project |     | 2024 Future With Project |     | 2025 Future Without Project |     | 2025 Future With Project |     | 2025 Future With Project and Potential Future Development |     |
|  | V/C <sup>1</sup> | LOS <sup>2</sup> | V/C                          | LOS | V/C                         | LOS | V/C                      | LOS | V/C                         | LOS | V/C                      | LOS | V/C   | LOS |
| 4. Vista del Mar/Grand Ave.                                      | 0.478            | A                | 0.470                        | A   | 0.548                       | A   | 0.540                    | A   | 0.583                       | A   | 0.575                    | A   | 0.575   | A   |
| 11. Main St./Imperial Hwy.                                       | 0.608            | B                | 0.610                        | B   | 0.619                       | B   | 0.624                    | B   | 0.633                       | B   | 0.632                    | B   | 0.632   | B   |
| 67. Sepulveda Blvd./Imperial Hwy.                                | 1.089            | F                | 1.056                        | F   | 0.910                       | E   | 0.849                    | D   | 0.940                       | E   | 0.893                    | D   | 0.895   | D   |
| 68. Sepulveda Blvd./Mariposa Ave.                                | 0.782            | C                | 0.786                        | C   | 0.835                       | D   | 0.835                    | D   | 0.823                       | D   | 0.827                    | D   | 0.829   | D   |
| 69. Sepulveda Blvd./Grand Ave.                                   | 0.875            | D                | 0.879                        | D   | 0.983                       | E   | 0.989                    | E   | 0.984                       | E   | 0.987                    | E   | 0.989   | E   |
| 70. Sepulveda Blvd./El Segundo Blvd.                             | 0.967            | E                | 0.967                        | E   | 1.036                       | F   | 1.033                    | F   | 1.050                       | F   | 1.049                    | F   | 1.051   | F   |
| 71. Sepulveda Blvd./Rosecrans Ave.                               | 1.001            | F                | 1.003                        | F   | 1.055                       | F   | 1.052                    | F   | 1.068                       | F   | 1.067                    | F   | 1.068   | F   |
| 85. Nash St./I-105 WB Ramps/Imperial Hwy.                        | 0.350            | A                | 0.258                        | A   | 0.446                       | A   | 0.410                    | A   | 0.480                       | A   | 0.496                    | A   | 0.498   | A   |
| 86. Nash St./El Segundo Blvd.                                    | 0.579            | A                | 0.560                        | A   | 0.694                       | B   | 0.679                    | B   | 0.721                       | C   | 0.708                    | C   | 0.708   | C   |
| 87. Douglas St./ Imperial Hwy.                                   | 0.579            | A                | 0.578                        | A   | 0.706                       | C   | 0.699                    | B   | 0.739                       | C   | 0.715                    | C   | 0.717   | C   |
| 88. Douglas St./El Segundo Blvd.                                 | 0.854            | D                | 0.840                        | D   | 0.967                       | E   | 0.963                    | E   | 0.989                       | E   | 0.986                    | E   | 0.986   | E   |
| 97. Aviation Blvd./Imperial Hwy.                                 | 0.736            | C                | 0.759                        | C   | 0.865                       | D   | 0.867                    | D   | 0.923                       | E   | 0.923                    | E   | 0.931   | E   |
| 98. Aviation Blvd./West 120 <sup>th</sup> St.                    | 0.728            | C                | 0.709                        | C   | 0.920                       | E   | 0.918                    | E   | 0.968                       | E   | 0.941                    | E   | 0.945   | E   |
| 99. Aviation Blvd./El Segundo Blvd.                              | 0.955            | E                | 0.949                        | E   | 1.063                       | F   | 1.060                    | F   | 1.076                       | F   | 1.078                    | F   | 1.084   | F   |
| 100. Aviation Blvd./Rosecrans Ave.                               | 0.920            | E                | 0.916                        | E   | 0.995                       | E   | 0.992                    | E   | 1.013                       | F   | 1.013                    | F   | 1.016   | F   |

Notes:

1 Volume/capacity.

2 Level of service.

**ATTACHMENT F**

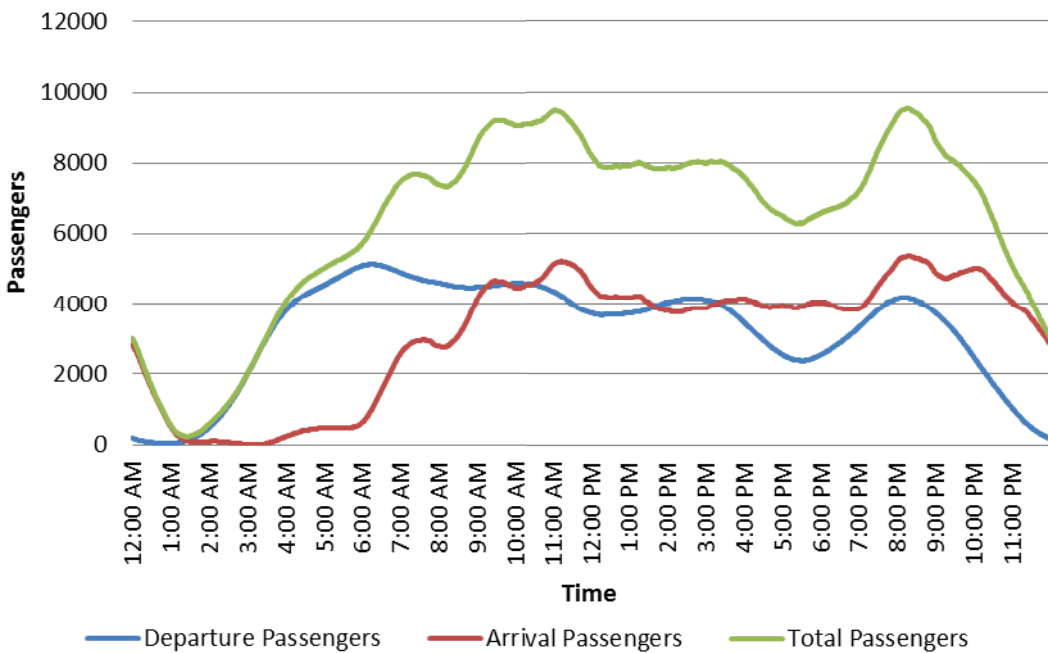
**LAMP DEIR Figures 4.12.1-4, 4.12.1-8 and 4.12-9  
LAX Passenger Arrival and Departure Hourly Patterns  
Existing, 2024 and 2035**

**(Source: Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, September 2016.)**

1325900.1

The international arriving passenger data used for this analysis for both the existing and future conditions was generated based on: (a) the existing geometric configuration and operational conditions; and (b) future configurations, aircraft fleet mixes, and operational conditions. Departing and arriving passenger volumes at the curbside were calculated for domestic and international passengers for a 24-hour period in 1-minute increments. Each sixty successive 1-minute passenger counts were added to generate a rolling hourly passenger count total. From these data, the departures and arrivals peak hour passenger volumes by time of day were determined. **Figure 4.12.1-4** depicts the rolling hourly departing and arriving passenger flows in 2014 for the CTA curbside. **Table 4.12.1-3** summarizes the 2014 Airport passenger arrivals and departures peak hours.

**Figure 4.12.1-4: Existing (2014) Rolling Hour Departure and Arrival Passengers Volumes**

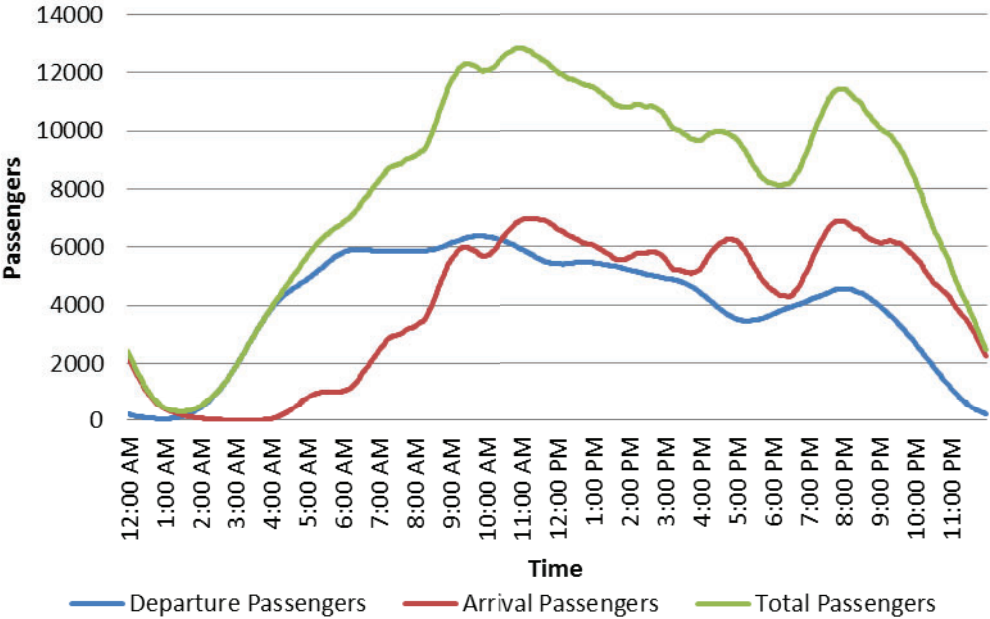


SOURCE: Ricondo & Associates, Inc. May 2016.  
 PREPARED BY: Ricondo & Associates, Inc. May 2016.



Figure 4.12.1-8 depicts the rolling hourly terminating and originating passenger flows at the CTA curbsides for the future 2024 conditions. The passenger flows show that in 2024, there would be two pronounced peaks in passenger activity on the arrivals level curbsides with the peak hour occurring from 11:15 a.m. to 12:15 p.m. resulting in a total of 6,976 passengers on the curbside. Similarly, departing passenger flows show that in 2024, the peak hour would occur between 9:51 a.m. to 10:51 a.m. with a total of 6,377 passengers on the curbside.

Figure 4.12.1-8: Future (2024) Rolling Hour Departure and Arrival Passengers Volumes



SOURCE: Ricondo & Associates, Inc. May 2016.  
PREPARED BY: Ricondo & Associates, Inc. May 2016.

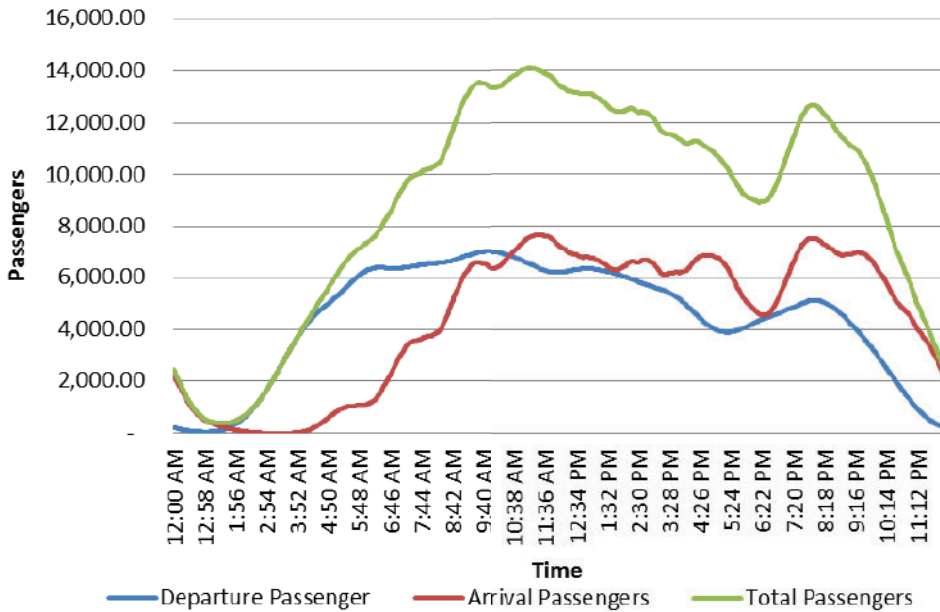
4.12.1.8.2 Determination of Future (2024) Traffic Volumes

The calibrated trip generation and trip distribution models for the 2014 departures and arrivals peak hours were used as a basis for estimating the peak hour CTA vehicle volumes for each of the future (2024) conditions. As part of this process, adjustments were made to the 2014 passenger mode splits to reflect the two ITFs and CONRAC, and how changes to the regional transportation network would affect passenger mode choice and resultant vehicle activity at the Airport (see Section 4.12.1.9.1 for methods used to adjust 2024 mode splits). Table 4.12.1-8 and Table 4.12.1-9 present the passenger mode splits used to estimate the CTA traffic volumes in 2024 on the departures level and arrivals level, respectively. The passenger mode splits represent the proportion of total airline passengers using each vehicle mode during the peak hours analyzed. The tables also present the modes picking-up or dropping-off passengers at either of the ITFs or CONRAC. These passengers would use the APM to access the CTA.

flight schedule representative of passenger activity level of 95 MAP was used.<sup>14</sup> The passenger schedule for 2035 Without Project and With Project conditions was the same, as the proposed Project would not affect the number or type of aircraft operations or passenger activity levels at LAX.

Figure 4.12.1-9 depicts the rolling hourly terminating and originating passenger flows at the CTA curbsides for 2035 conditions. The passenger flows show that 2035 conditions would produce two pronounced peaks in passenger activity on the arrivals level curbsides with the peak hour occurring from 11:30 a.m. to 12:30 p.m. resulting in a total of 7,659 passengers on the curbside. Similarly, departing passenger flows show the 2035 conditions would result in the peak hour occurring between 9:51 a.m. to 10:51 a.m. with a total of 7,006 passengers on the curbside.

Figure 4.12.1-9: Future (2035) Rolling Hour Departure and Arrival Passengers Volumes



SOURCE: Ricondo & Associates, Inc. May 2016.  
PREPARED BY: Ricondo & Associates, Inc. May 2016.

<sup>14</sup> Ricondo & Associates, Inc., LAX 2024 and 2035 Passenger Flight Schedules, August 2016.

Table 4.12.2-4: Summary of Existing (2015) Trip Generation

|                             | 2015 BASELINE |              |               |
|-----------------------------|---------------|--------------|---------------|
|                             | IN            | OUT          | TOTAL         |
| <b>AM PEAK HOUR</b>         |               |              |               |
| Central Terminal Area (CTA) | 4,039         | 3,776        | 7,815         |
| Airport Parking             | 148           | 19           | 167           |
| Off-Airport Parking         | 233           | 55           | 288           |
| Rental Car Facilities       | 766           | 513          | 1,279         |
| Employee Parking            | 759           | 280          | 1,039         |
| Cargo Facilities            | 978           | 772          | 1,750         |
| <b>TOTAL</b>                | <b>6,923</b>  | <b>5,415</b> | <b>12,338</b> |
| <b>MD PEAK HOUR</b>         |               |              |               |
| Central Terminal Area (CTA) | 5,219         | 5,377        | 10,596        |
| Airport Parking             | 114           | 51           | 165           |
| Off-Airport Parking         | 191           | 97           | 288           |
| Rental Car Facilities       | 1,232         | 863          | 2,095         |
| Employee Parking            | 639           | 549          | 1,188         |
| Cargo Facilities            | 949           | 816          | 1,765         |
| <b>TOTAL</b>                | <b>8,344</b>  | <b>7,753</b> | <b>16,097</b> |
| <b>PM PEAK HOUR</b>         |               |              |               |
| Central Terminal Area (CTA) | 3,956         | 4,428        | 8,384         |
| Airport Parking             | 102           | 38           | 140           |
| Off-Airport Parking         | 116           | 106          | 222           |
| Rental Car Facilities       | 541           | 573          | 1,114         |
| Employee Parking            | 338           | 586          | 924           |
| Cargo Facilities            | 940           | 1,116        | 2,056         |
| <b>TOTAL</b>                | <b>5,993</b>  | <b>6,847</b> | <b>12,840</b> |

SOURCE: Ricondo and Associates, Inc., July 2016.

PREPARED BY: Ricondo and Associates, Inc., July 2016.

**ATTACHMENT D**



January 21, 2021

Ref 1326

Laurel Impett, AICP  
Shute, Mihaly & Weinberger LLP  
396 Hayes Street  
San Francisco, CA 94102-4421

*Re: Review of LAX ATMP EIR*

Dear Ms. Impett:

Per your request, Tamura Environmental, Inc. has reviewed the air quality and greenhouse gas sections of the Draft EIR (DEIR) for the Los Angeles International Airport (LAX) Airfield & Terminal Modernization Project (ATMP).<sup>1</sup> Our review revealed a number of issues with the DEIR, with one of the most significant being that it does not evaluate the year when the project actually impacts LAX's capacity. By only evaluating the year that construction is complete, it underestimates operational emissions of criteria air pollutants, toxic air contaminants and greenhouse gases (GHG) associated with the project. These issues, which are presented below, must be addressed prior to the certification of the environmental document and approval of the ATMP.

### **Project Context/Existing Conditions**

Operational emissions from the airport (identified in Appendix C.2 of the ATMP DEIR) are summarized in Tables 1 and 2 on the following page; the majority of the VOC, NO<sub>x</sub>, and SO<sub>x</sub> emissions are from the aircraft. To provide some context for the airport's NO<sub>x</sub> emissions relative to recent emissions inventory calculations by the South Coast Air Quality Management District (SCAQMD):<sup>2</sup>

- The daily NO<sub>x</sub> emissions from LAX are approximately 4% of the daily emissions for the entire South Coast Air Basin (SCAB) in 2018, and are projected to be approximately 7% of the Basin's total in 2028.
- The 2018 annual NO<sub>x</sub> emissions from LAX are over half of the emissions of all "point sources" (permitted industrial sources) in the entire SCAB, and are more than double the combined NO<sub>x</sub> emissions of all the petroleum refineries in the Wilmington/Carson/West Long Beach area.

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<sup>1</sup> [Los Angeles World Airports \(LAWA\), Draft Environmental Impact Report \(Draft EIR\) - Airfield & Terminal Modernization Project, Los Angeles International Airport, State Clearinghouse No. 2019049020, October 2020.](#)

<sup>2</sup> SCAQMD, "Emissions Inventory in the Base and Future Milestone Years – Point and On-Road Mobile sources", presentation at Technical Advisory Group Meeting, May 29, 2019, available from <https://www.aqmd.gov/docs/default-source/ab-617-ab-134/technical-advisory-group/presentation-may29-2019.pdf?sfvrsn=9>.

- The magnitude of the increase in LAX operational NO<sub>x</sub> emissions between 2018 and 2028 (1.25 tons per day) is roughly 40-50% of the magnitude of the total SCAB-wide NO<sub>x</sub> reductions identified in SCAQMD’s 2016 Clean Air Plan for “Traditional Regulatory Measures” in 2022 and 2023 (2.6 and 3.2 tons-per-day, respectively).<sup>3</sup>

These are comparisons to region-wide air emissions; clearly, the airport has a greater relative contribution locally. The DEIR acknowledges that “[t]he existing air quality setting in the immediate vicinity of the Project site is dominated by air pollutants from aircraft activities, including landings and take-offs, taxiing, and other aircraft movements; vehicles on airport roads and surrounding roads and highways; and industrial uses.” (p. 3-2)

Table 1. Annual Emissions from LAX.

|                             | CO<br>(tons/yr) | VOC<br>(tons/yr) | NO <sub>x</sub><br>(tons/yr) | SO <sub>x</sub><br>(tons/yr) | PM <sub>10</sub><br>(tons/yr) | PM <sub>2.5</sub><br>(tons/yr) | GHG<br>(metric<br>tonnes<br>CO <sub>2</sub> e/yr) |
|-----------------------------|-----------------|------------------|------------------------------|------------------------------|-------------------------------|--------------------------------|---|
| 2018                        | 9,823           | 945              | 5,448                        | 411                          | 503                           | 193                            | 2,151,823   |
| 2028 (No Project)           | 9,077           | 854              | 5,892                        | 499                          | 611                           | 223                            | 2,335,427   |
| 2028 (With Project)         | 9,133           | 871              | 5,891                        | 498                          | 620                           | 225                            | 2,356,700   |
| 10-Year Change <sup>a</sup> | -690            | -74              | +443                         | +87                          | +117                          | +32                            | +204,877  |

<sup>a</sup>Values shown are the difference between the 2028 (With Project) case and 2018; the difference between 2028 (No Project) and 2018 is not qualitatively different.

Table 2. Daily Emissions of Criteria Pollutants from LAX.

|   | CO<br>(lbs/day) | VOC<br>(lbs/day) | NO <sub>x</sub><br>(lbs/day) | SO <sub>x</sub><br>(lbs/day) | PM <sub>10</sub><br>(lbs/day) | PM <sub>2.5</sub><br>(lbs/day) |
|---|-----------------|------------------|------------------------------|------------------------------|-------------------------------|--------------------------------|
| 2018 Operations                           | 55,339          | 5,323            | 30,690                       | 2,314                        | 2,834                         | 1,090                          |
| Construction – Max. Year                  | 4,394           | 385              | 805                          | 173                          | 33                            | 20                             |
| 2028 Operations (No Project)              | 51,140          | 4,813            | 33,193                       | 2,812                        | 3,440                         | 1,256                          |
| 2028 Operations (With Project)            | 51,456          | 4,906            | 33,199                       | 2,808                        | 3,492                         | 1,268                          |
| 10-Year Change in Operations <sup>a</sup> | -3,883          | -417             | +2,509                       | +495                         | +658                          | +178                           |

<sup>a</sup> Values shown are the difference between the 2028 (With Project) case and 2018; the difference between 2028 (No Project) and 2018 is not qualitatively different.

LAX handled 88 million annual passengers (MAP) in 2019, making it the third-busiest airport in the world.<sup>4</sup> It is also projected to grow: i.e., the recently released South Coast Association of Governments (SCAG) Regional Transportation Plan/Sustainable Communities Strategy, “Connect SoCal”, projects 127 MAP at LAX in 2045.<sup>5</sup> While the Program EIR for Connect

<sup>3</sup> SCAQMD, Final 2016 Air Quality Management Plan, March 2017, available from <http://www.aqmd.gov/home/air-quality/clean-air-plans/air-quality-mgt-plan/final-2016-aqmp>, p. ES-10.

<sup>4</sup> The Port Authority of NY and NJ, “Top 60 Worldwide Airport Comparison: World Passengers Traffic, Ranked by Passenger”, Section 2.1.2 in [2019 Airport Traffic Report, May 2020](#).

<sup>5</sup> “SCAG Region Airport Passenger Forecast for 2020–2045”, Table 3.3 in [SCAG, “The 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy of the Southern California Association of Governments” \(Connect SoCal\), adopted on September 3, 2020](#).

SoCal concludes that total emissions for the South Coast Air Basin (SCAB) “are expected to generally decline through at least 2031 except for small increases in PM<sub>2.5</sub> and SO<sub>x</sub>”,<sup>6</sup> the ATMP DEIR projects increasing NO<sub>x</sub> (an ozone precursor) and other air pollutants from LAX.

For existing conditions, the DEIR provides air pollutant data from a monitor on the north side of LAX, which is obviously very close to the project. However, the DEIR should acknowledge that the prevailing wind direction is more westerly (from the west) than southerly,<sup>7</sup> and that local air quality monitoring data are not available for areas immediately east of the airport.

### **Project Relationship to LAX Capacity; Time Horizons and Cumulative Impacts**

Throughout the DEIR, there are statements identifying that the ATMP does not increase the airport’s capacity, which is a key reason why Tables 1 and 2 above show relatively minor differences between the “No Project” and “With Project” scenarios: i.e., the ATMP identifies that the air traffic volumes are the same for both scenarios (differences in aircraft emissions appear to be due to differences in the routing of aircraft on the ground). However, this conclusion is a result of the fact that the DEIR only considers the future year of 2028, immediately after the project construction is completed, and before its impact on LAX capacity is realized.

The DEIR identifies that the overall operational capacity of an airport is influenced by three key components – airfield, terminal, and landside – and that the most limiting factor is currently the four-runway airfield system, which begins to constrain annual capacity in 2029. Accordingly, the DEIR asserts that the project does not impact capacity in 2028, but the ATMP clearly appears to be one of a number of projects that are occurring over time to ensure that LAX is capable of handling unconstrained demand for the airport. This is further reinforced by a statement in Appendix B of the DEIR:

“Several terminal facilities at LAX have been in the process of being modernized to ensure the ability of aging terminal facilities and passenger processors to accommodate demand for air travel. These projects include the Midfield Satellite Concourse, the LAX Terminals 2 and 3 Modernization Project, and LAX Terminal 1.5 Project. Therefore, existing and planned terminal facilities would provide adequate processing facilities for all existing and planned passenger gates in FY 2028 and FY 2033.”<sup>8</sup>

Past CEQA analyses conducted for each of the three projects mentioned as “ensur[ing] the ability...to accommodate demand for air travel” also only looked out to the year that their

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<sup>6</sup> [SCAG, Connect SoCal Certified Final Program Environmental Impact Report, State Clearinghouse #20199011061, May 2020](#), p. 3.3-60.

<sup>7</sup> This is reflected in wind rose information as well as figures in the paper by Hudda et al., “Emissions from an International Airport Increase Particle Number Concentrations 4-fold at 10 km Downwind”, *Environ. Sci. Technol.* 2014, **48**, 12, 6628-6635, <https://doi.org/10.1021/es5001566>

<sup>8</sup> ATMP DEIR, p. 6-5; Ricondo & Associates, “Los Angeles International Airport: LAX Airfield and Terminal Modernization Project – Draft Activity Forecasts Report”, August 2020 (in [“Activity Forecasts and Operational Analyses”, Appendix B to the ATMP DEIR](#)), p. 4-6.

construction was complete, and also made statements about how they did not impact capacity.<sup>9,10,11</sup> The ATMP DEIR does compare the overall increases in airport emissions between 2018 and 2028 to CEQA significance thresholds (and finds that the increases are significant), but this is looking at growth over the time period needed to construct the project, not growth associated with the actual project.

There are at least two key issues with the ATMP DEIR continuing this paradigm of only considering impacts at the time of project completion:

1. The analyses do not consider “direct physical changes in the environment which may be caused by the project and reasonably foreseeable indirect physical changes in the environment which may be caused by the project” as required by CEQA Guidelines [§15064(d)]. The airport clearly needs to plan in advance and enact a number of projects in order to expand in the future, and the reasonably foreseeable impacts of individual projects are not realized at the time that their construction is completed. At a minimum, the DEIR should include an analysis of the impacts of the capacity-increasing aspects of projects, even if they are being completed in advance of the point in time where the terminal’s overall capacity is limited by them (as it seems that they would always be). For nonattainment pollutants their precursors, such an analysis is also required by Federal General Conformity regulations: i.e., the analysis of a project’s conformity with the California’s EPA-approved State Implementation Plan (SIP) for attaining the National Ambient Air Quality Standards (NAAQS) is required to be based on the total of direct and indirect emissions<sup>12</sup> from the action and must address the year during which the total of direct and indirect emissions from the action is expected to be greatest on an annual basis [40 CFR 93.159(d)]. 2028 is not “the year during which the total of direct and indirect emissions from the action is expected to be the greatest on an annual basis”, and the DEIR underestimates the latter by only estimating emissions during 2028. The EIR needs to evaluate the year during which the total of direct and indirect emissions from the action is expected to be the greatest on an annual basis (even if that capacity is a result of concerted projects on the airfield, terminal, and landside components of the airport) – which in turn is a function of the extent of the future terminal capacity that the ATMP provides.

<sup>9</sup> “the MSC North Project would not alter the airspace traffic, runway operational characteristics, or the practical capacity of the Airport. As such, changes in emissions from aircraft operations over the 2012 existing conditions are due to increased travel demand and changes in aircraft fleet mixes that are projected to occur by 2019 irrespective of the proposed MSC North Project.” ([LAWA, DEIR for LAX Midfield Satellite Concourse, Section 4.1](#), p. 4-40.)

<sup>10</sup> “the proposed project would not alter the airspace traffic, runway operational characteristics, or the practical capacity of the airport; therefore, the proposed project would not increase the number of daily flights arriving and departing from LAX or the growth in aviation activity at LAX that is projected to occur in the future.” ([LAWA, DEIR for LAX Terminals 2 & 3 Modernization Project, Section 6](#), p. 6-3.)

<sup>11</sup> “The proposed project, including the removal of Gate 10, would not increase airport capacity or affect the routing of aircraft in the air to and from LAX. No change in air traffic patterns would occur and no change in safety risks would result. Therefore, no impact would occur and no mitigation is required.” ([LAWA, Final Initial Study/Mitigated Negative Declaration for LAX Terminal 1.5 Project](#), p. B-70.)

<sup>12</sup> *Indirect emissions* means “those emissions... (1) That are caused or initiated by the Federal action and originate in the same nonattainment or maintenance area but occur at a different time or place as the action; (2) That are reasonably foreseeable; (3) That the agency can practically control; and (4) For which the agency has continuing program responsibility.” [§93.152]



2. CEQA requires that EIRs discuss cumulative impacts—“the cumulative impact from several projects is the change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects” [§15355]—and that this discussion “reflect the severity of the impacts and their likelihood of occurrence” [§15064(d)]. The cumulative impacts section of the ATMP DEIR identifies other projects within the 2018-2028 timeframe, but does not actually evaluate the cumulative impacts when added to other closely related past or reasonably foreseeable future projects. Specifically, a formal projection of LAX capacity growth is identified in the Connect SoCal Regional Transportation Plan), and Appendix B identifies that the four-runway airfield system starts to constrain airport operations in 2029 but the existing terminal and landside capacity is sufficient to handle unconstrained demand through 2033. Both of these indicate that it is reasonably foreseeable that the four-runway airfield system will be modified. However, this also was not analyzed anywhere in the DEIR. The ATMP DEIR needs to include a discussion of those cumulative impacts as prescribed by CEQA, not just an analysis of cumulative impacts between 2018 and 2028.

### Project Description/Characterization

The DEIR contains seemingly contradictory statements about the ATMP’s impact on capacity. On one hand, it identifies the underlying purpose of the ATMP as being “integral to Los Angeles’ plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal” and to “help LAX to prepare early for the continued aviation growth that is projected”.<sup>13</sup> However, it then subsequently states that “the ability to accommodate the future aviation demand projected for LAX is not dependent on any of the improvements associated with the proposed Project”.<sup>14</sup> The EIR needs to resolve these inconsistencies and quantify the extent to which hosting the Olympic and Paralympic games requires more capacity than what is predicted using the standard growth-projection methods identified in Appendix B.

In addition, while Appendix B identifies the average delay for the build and no-build scenarios, its discussion of terminal and landside capacity does not clearly identify the extent to which the ATMP increases the airport’s capacity to handle more passengers and aircraft. The final EIR should identify the extent to which the ATMP affects the airport’s capacity to handle more passengers and aircraft.

### State Implementation Plan (SIP) Conformity

While the DEIR acknowledges the SIP that is submitted to EPA for purposes of assuring attainment of the National Ambient Air Quality Standards (NAAQS), there is little mention of the fact that sufficiently large projects in NAAQS nonattainment areas such as the SCAB—i.e., projects where emissions are not subject to stationary source permitting requirements—need to

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<sup>13</sup> ATMP DEIR, p. 2-18.

<sup>14</sup> Ibid., p. 6-5. The context for this sentence could be interpreted as being only applicable to 2028, but still appears inconsistent with the earlier statement about the Olympic and Paralympic Games.

evaluate and (if necessary) make a determination of “General Conformity” with the SIP in accordance with 40 CFR 93. These determinations are technically the responsibility of the Federal agency issuing the approval (Appendix C of the DEIR identifies that the Federal Aviation Administration will be evaluating General Conformity<sup>15</sup>), but it is typically the responsibility of the project proponents to provide the information needed for the Federal agency to make that evaluation. In addition, the conformity determination is relevant to the DEIR given that (1) air quality modeling may be required and (2) such demonstrations can potentially result in the requirement for additional mitigation (potentially including the purchase of emissions offsets). Moreover, Federal agencies are precluded from approving projects unless General Conformity requirements are addressed and complied with. The EIR needs to provide information pertinent to the evaluation of the project’s General Conformity with the SIP.

### Health Impacts of Secondary Air Pollutants

The Supreme Court of California rendered a decision indicating that CEQA requires an EIR to contain discussions that estimate the specific human health effects that would occur as a result of a project’s significant air pollutant emissions, or explain why such further evaluation is infeasible.<sup>16</sup> This case is referred to as the Friant Ranch decision.

The 2,509 lb/day of operations-related emissions increases of NO<sub>x</sub> identified in the DEIR are approximately 46 times greater than the CEQA significance threshold of 55 lb/day established by SCAQMD.<sup>17</sup> The DEIR determines that even with mitigation, this would remain a significant and unavoidable impact.

The DEIR acknowledges the Friant Ranch decision. However, it declines to conduct the necessary analysis suggesting it is unnecessary because EIRs for two other projects conducted the evaluation and found only small impacts:

“...the changes in emissions of ozone precursors and PM<sub>2.5</sub> from a single project do not “move the dial” with regard to regional human health impacts. The models available to analyze regional impacts are designed to address large, regional changes in emissions, such as those due to proposed emission control regulations that affect emissions across an entire region. Given the uncertainties in emissions, dispersion modeling, and human health concentration-response functions, the conclusion reached in these two studies was that the results to human health impacts were not statistically different than zero (i.e., no change)”.<sup>18</sup>

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<sup>15</sup> CDM Smith, “Los Angeles International Airport Airfield and Terminal Modernization Project, Final CEQA Protocol for Conducting an Air Quality Impact Analysis of Criteria Air Pollutants,” June 4, 2020 (in [“Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy”](#), Appendix C to Los Angeles World Airports (LAWA), Draft Environmental Impact Report (Draft EIR) - Airfield & Terminal Modernization Project, Los Angeles International Airport, State Clearinghouse No. 2019049020, October 2020), p. 1-1.

<sup>16</sup> *Sierra Club et al. v. County of Fresno* (2018) 6 Cal.5th 502, p. 21.

<sup>17</sup> ATMP DEIR p. 4.1.1-44.

<sup>18</sup> ATMP DEIR, p. 4.1.1-42.

The two projects referred to were the airport Master Plan for San Jose's Mineta Airport (SJC) and the Inglewood Basketball and Entertainment Center (which did not have comparable NO<sub>x</sub> emissions to the proposed LAX expansion). The Mineta Airport EIR identified current (2018) NO<sub>x</sub> emissions of 3,853 lb/day (far below LAX's 30,690 lb/yr), projected that these emissions would increase by 5,325 lb/day by 2037 (19 years out),<sup>19</sup> and calculated that the maximum associated increase in ozone (averaged over a 4 km × 4 km area) was approximately 2 parts per billion (ppb) (8-hour average);<sup>20</sup> the 8-hour NAAQS and CAAQS for ozone are 70 ppb.

We reviewed the Mineta EIR and found no text identifying that the corresponding human health impacts were “not statistically different than zero (i.e., no change)”, only that there were several conservative assumptions and that actual impacts could be as low as zero. The ATMP DEIR authors should include a citation to the Mineta EIR where it states that the impacts to human health were “not statistically different” than zero.

The ATMP DEIR compares the 10-year emissions increase calculated for this Project to the 19-year increase calculated for Mineta Airport, and concludes that:

“[i]f the proposed Project emissions were applied to the SJC site, the resulting health impacts from ozone would likely be the same as, or less than, those modeled for the SJC Master Plan Amendment Draft EIR...the resulting change in health end-point incidences would be <0.05 percent for both ozone and PM<sub>2.5</sub> emissions.”<sup>21</sup>

There are several flaws with the DEIR's discussion of this topic, including the following:

- As discussed previously, the DEIR does not accurately reflect the full extent of the increase in emissions that would result from the ATMP because it only identifies the increase in LAX emissions between 2018 and 2028.
- It does not identify how the “<0.05 percent” conclusion was arrived at. More importantly, it neglects the well-known fact that ozone impacts are not a function of project emissions alone, they are a complex function of NO<sub>x</sub> and VOC emissions in the surrounding environment, meteorology (including sunlight/temperature), and topography, all of which are different for Los Angeles than San Jose. Therefore, making a quantitative statement regarding this project's ozone impacts based on applying its emissions to photochemical modeling conducted in San Jose is not valid.
- By providing only a percent change in “health end-point incidences”, it does not fully address the statements in the Friant Ranch judgment that CEQA requires an EIR to make

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<sup>19</sup> David J. Powers & Associates, Integrated Final Environmental Impact Report, Amendment to Norman Y. Mineta San Jose International Airport Master Plan, City of San Jose PP 18-103, SCH #2018102020, April 2020, available from <https://www.sanjoseca.gov/your-government/department-directory/planning-building-code-enforcement/planning-division/environmental-planning/environmental-review/active-eirs/sjc-airport-master-plan-update>, p. 72 and p. 87.

<sup>20</sup> Ramboll US Corporation, Mineta San Jose Airport Supplemental Air Quality Impacts Analysis, San Jose, California, October 2019 (available from <https://www.sanjoseca.gov/Home/ShowDocument?id=61650>), Appendix B, p. 9.

<sup>21</sup> ATMP DEIR, p. 4.1.1-48.

“a reasonable effort to discuss relevant specifics regarding the connection between two segments of information already contained in the EIR, the general health effects associated with a particular pollutant and the estimated amount of that pollutant the project will likely produce. This discussion will allow the public to make an informed decision, as CEQA requires.”<sup>22</sup>

Specifically, the general public does not have an understanding of “health end-point indices”, either on a technical basis or in an applied sense. Given the magnitude of the NO<sub>x</sub> emissions associated with LAX cumulatively, as well as the climate and topography of the SCAB as a whole, it is hard to imagine a site more deserving of photochemical grid modeling than this one. The DEIR should have conducted photochemical grid modeling. In addition, while the traditional “grid size” (averaging area) is 4 km × 4 km, it is recognized that efforts have been made to develop the photochemical grid model for neighborhood-scale analyses. The EIR should be revised to evaluate and explain the extent to which it is possible to meaningfully evaluate impacts more closely than the traditional 4 km × 4 km grid square. Given that the increase in annual NO<sub>x</sub> emissions over just a 10-year period is approximately 46 times higher than the SCAQMD’s significance threshold, LAWA should “relate the expected adverse air quality impacts [pollutant concentrations] to the project’s likely health consequences, per the Friant Ranch decision.

### **Toxics Health Risk Analysis**

Health risks associated with operational emissions of Toxic Air Contaminants (TACs) from the 2028 build scenario are presented as “incremental” values, relative to either 2018 or the 2028 no-build scenario. DEIR Table 4.1.2-2 shows the incremental cancer risk from the Project’s construction and operation declining between 2018 and 2028. This is in part because TAC emissions are a fraction of the emissions of volatile organic compounds (VOC)—which are identified as decreasing from 2018 to 2028—and emissions of particulate matter (PM)—which are identified as increasing only slightly (and not in excess of significance thresholds). However, the DEIR’s health risk analysis has the same deficiency that was identified for the analysis of criteria air pollutants: i.e., not evaluating the actual impact of the proposed project on operations beyond 2028 (i.e., when the project actually makes a difference in the airport’s emissions). As discussed above, the EIR should be revised to identify the reasonably foreseeable changes in emissions which may be caused by the Project.

### **Greenhouse Gases/Climate Change**

As with the DEIR’s analysis of criteria air pollutant emissions, the DEIR also underestimates the Project’s increase in greenhouse gas (GHG) emissions because it does not evaluate the impact of the Project beyond 2028. The EIR should be revised to identify the reasonably foreseeable changes in the environment which may be caused by the project. In addition, Section 4.4.2.2 should clearly identify the boundary of the aircraft GHG emissions inventory. While there is a

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<sup>22</sup> *Sierra Club et al. v. County of Fresno*, p. 23.

logical basis for using the “mixing height” cutoff with regard to criteria pollutant emissions, there is not an analogous logical basis for using it for GHG emissions.

### Criteria Air Pollutant and GHG Mitigation

CEQA requires that EIRs identify the following with regard to mitigation:

“where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified. Formulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project’s environmental review provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the type(s) of potential action(s) that can feasibly achieve that performance standard and that will [be] considered, analyzed, and potentially incorporated in the mitigation measure.” [§15126.4(a)(1)(B)]

The DEIR identifies on p. 4.1.1-43 that several types of mitigation measures (listed in Appendix C.9) were considered, but determines that most were “not applicable or feasible” with regard to the ATMP. It does not identify a clear basis for selecting the measures identified in the body of the DEIR. Several of the measures included in the DEIR (intended to address the ATMP’s significant air quality and GHG impacts) include neither specific details nor the commitment or performance standards required by CEQA identified above. The DEIR should be revised to ensure that the mitigation measures comply with CEQA’s requirements.

The DEIR identifies the following significant impacts and proposed mitigation measures:<sup>23</sup>

1. Emissions of CO, VOC, NO<sub>x</sub> and SO<sub>x</sub> associated with ATMP construction would constitute a significant impact; the two proposed mitigation measures (MM) are:
  - a. MM-AQ/GHG (ATMP)-1: Rock Crushing Operations (on-site crushing/waste reuse)
  - b. MM-AQ/GHG (ATMP)-2: Use of Renewable Diesel Fuel (in construction equipment and on-site water trucks)
  - c. MM- C (ATMP)-1. Construction Mitigation Oversight.
2. Increases in airport operational emissions of NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> between 2018 and 2028 would constitute a significant impact. Proposed MM:
  - a. MM-AQ/GHG (ATMP)-3: Parking Cool Roof
  - b. MM-AQ/GHG (ATMP)-4: Electric Vehicle (EV) Charging Infrastructure
  - c. MM-AQ/GHG (ATMP)-5: EV Purchasing
  - d. MM-AQ/GMG (ATMP)-6: Solar Energy Technology
  - e. MM-T (ATMP)-1: Vehicle Miles Traveled (VMT) Reduction Program

<sup>23</sup> ATMP DEIR, Sections 4.1.1.5 and 4.4.5.

3. Increases in GHG from construction and operations would constitute a significant impact.  
Proposed MM:

- a. All of the measures identified for #1 and #2 above
- b. MM-GHG (ATMP)-1. Demolition Waste (recycling)
- c. MM-GHG (ATMP)-2. Organic Waste Collection and Diversion
- d. MM-GHG (ATMP)-3. Green Procurement (adoption of a policy)
- e. MM-GHG (ATMP)-4. Enhanced Recycling (enhancing existing program)
- f. MM-GHG (ATMP)-5. Landscaping Water (non-potable water for landscaping)

Several of the measures are vaguely worded and/or contingent on the extent to which they are “feasible”, available at a “comparable price”, etc. Therefore, the measures do not provide concrete commitment that they will be implemented. Nor do they provide adequate information with regard to the criteria for how feasibility will be assessed, what is considered to be a “comparable” price, etc. For example:

- MM-AQ/GHG (ATMP)-1: Rock Crushing Operations requires contractors to conduct rock-crushing on-site and reuse waste “to the maximum extent feasible (determined based on facility capacity and capability, project schedule, costs and regulatory conditions)”. However, there is no commitment; i.e., there is nothing in the text to prevent a contractor from simply saying that rock-crushing and the reuse of waste is not feasible.
- MM-AQ/GHG (ATMP)-2 calls for use of renewable diesel fuel for equipment and trucks “as feasible based on commercial renewable fuel availability...at a “comparable price” and without incurring “a substantial transportation cost.” Again, this could lead to no renewable diesel use at all; i.e., phrases such as “comparable price” and “substantial transportation cost” are subjective.
- MM-AQ/GHG (ATMP)-6 “requires LAWA to implement solar energy...where feasible based on [several factors]”. Here too, there is nothing in this measure that requires LAWA to make any type of feasibility assessment and so there is no assurance that solar energy would be implemented as the measure would suggest.

For each of these measures, the DEIR is not (1) identifying a commitment to implement and (2) adopting specific performance standards the mitigation will achieve, as required by CEQA.

As mentioned previously, CEQA requires that “where several measures are available to mitigate an impact, each should be discussed and the basis for selecting a particular measure should be identified.” Appendix C.9 lists 93 measures and states that “many of those potential measures are already being implemented at LAX under existing LAWA programs.... of the remaining measures, some were considered feasible to add as mitigation measures for the proposed Project, while others were determined to not be applicable or infeasible to include as mitigation measures for the Project” (p. C.9-1). However, the “remaining measures” text indicates that if a certain type of measure is already being implemented, there was not an evaluation of the extent to which more stringent commitments could be made.

For GHG, the CEQA Guidelines require that mitigation measures may include “Off-site measures, including offsets that are not otherwise required” [§15126.4(c)(3)]. Table C.9-1 identifies that while the creation of “a carbon offset purchasing strategy” was considered (measure #32), “FAA takes the position that any use of funds by LAWA absent a specific regulatory requirement is prohibited by revenue diversion policies”, citing a 1999 FAA policy. Given that CEQA does not include “specific” regulatory requirements for mitigation, it is unclear why LAWA is interpreting offsets as being different from any of the other mitigation measures. This should be explained in more detail.

Also, Table C.9 does not quantify the emission reduction potential associated with the listed measures. While there is some utility to identifying potential mitigation measures, LAWA should identify those measures that would be most effective in reducing emissions.

As identified in Appendix C.2 of the DEIR, aircraft are the most significant source of operational NO<sub>x</sub>, CO, VOC, and SO<sub>x</sub> emissions from LAX, and account for roughly half of the GHG emissions (with most of the remaining half being from autos, while other sources comprise less than 10% of the total).<sup>24</sup> Table C.9-1 mentions “sustainable (renewable) aviation jet fuel” (Measure #7) and “alternative fuels”/ “sustainable fuels” (Measure #23) for jets, yet there is no quantitative detail regarding the extent of the existing programs or project features at LAX. Nor is there any indication that LAWA considered ways to strengthen such measures to result in enhanced reduction of criteria air pollutant and GHG emissions (e.g., by increasing hydrant fueling infrastructure at existing gates). It is also not identified whether the fuels being referred to by these mitigation options included renewable-only fuels, California Low Carbon Fuel Standard-certified alternative jet fuels, or jet fuel formulations which are neither renewable nor LCFS-certified, but which emit fewer criteria air pollutants. Given the substantial amount of aircraft emissions generated at LAX, the evaluation of the feasibility of these measures needs to be described in more detail than is shown in Table C.9-1.

In addition to the relatively high-level “big picture” comments that we have identified earlier in this letter, we have several detailed comments that are identified in Attachment A to this letter.

Please contact me at (707) 773-3737 or [todd@tamuraenv.com](mailto:todd@tamuraenv.com) if you have any comments or questions regarding this letter.

Sincerely,

TAMURA ENVIRONMENTAL, INC.



Todd Tamura, QEP  
Principal

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<sup>24</sup> It is important to note that contributions of mobile sources like aircraft and autos is a strong function of assumed trip lengths and the extent to which emissions during those trips are attributed to LAX.

## Attachment A. Detailed Comments.

Below are detailed comments on the DEIR, that are in addition to the broader comments mentioned in the preceding letter.

**Details of Emissions Calculations**

The DEIR's Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions Appendix is over 1,200 pages long, but it does not identify key details of the analyses that were done. These omissions include, but are not necessarily limited to, the following:

1. Significance thresholds are on the basis of maximum pounds per day, and the DEIR identifies that even though the ATMP does not increase the airport's capacity in 2028, it is "integral to Los Angeles' plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal" (p. 2-18). Please provide details of how the demand associated with these plans were factored into the calculation of maximum daily emissions.
2. Aircraft emissions are identified as being calculated using the FAA's Aviation Environmental Design Tool (AEDT) emissions model, but the only model inputs identified in Appendix C.2 appear to be those associated with SIMMOD activity, aircraft, and airframe/engine pairings. Other inputs are relevant to emissions, such as the assumed fuel sulfur content. Furthermore, emissions inventories for mobile sources are completely a function of how much of their travel is incorporated (i.e., what the boundaries of the inventory are). For purposes of calculating the Project's criteria air pollutant emissions, the DEIR appears to have assumed that aircraft travel up to a mixing height of 1,806 feet<sup>25</sup> (which has some justification, for tropospheric pollutants) but the DEIR does not identify the boundary assumed in its calculation of GHG emissions. Was the same boundary used? If not, what boundaries were set for evaluating GHG emissions?
3. On-road vehicles are significant portions of the Project's operational emissions inventories and the quantification of their emissions can be a strong function of how exactly they were calculated. With regard to the trip lengths, was the CalEEMod® default of 20 miles (one-way) used, and if not, what was assumed? Page 4.1.1-7 of the DEIR identifies that EMFAC2017 was used (and off-model adjustment factors were applied), and Appendix C identifies speed-specific emission factors (and speed assignments to roadways), but the details of precisely which inputs to EMFAC2017 were used and how adjustment factors were applied are not explained in Appendix C. Please provide that explanation.
4. For off-road vehicles, p. 4.1.1-7 of the DEIR identifies that calculations were "based on" ARB's OFFROAD2017/ORION model, but the inputs identified on p. 18 of Appendix C are not in the format of inputs used in that model, and the outputs on pp. 21-27 are not OFFROAD2017/ORION outputs. The format of the data in Appendix C indicate that the

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<sup>25</sup> ATMP DEIR, p. 4.1.1-10.



calculations were done manually with a spreadsheet, but spreadsheet validation/sample calculations are not shown, only the results. The DEIR should have also provided the basis for the assumptions on pdf page 18 of Appendix C: i.e., 3% Tier 3, 30% Tier 4 Interim, 65% Tier 4 Final, with half of the Tier 3 engines identified as being equipped with 85% effective Diesel Particulate Matter (DPM) filters. Is LAWA committed to meeting this percentage?

5. Sulfur in fuel can be converted to either SO<sub>2</sub> (IV oxidation state) or sulfate (SO<sub>4</sub><sup>2-</sup>, VI oxidation state) when combusted, and sulfate compounds (sulfates) can be an important contributor to total PM mass emissions from aircraft turbines.<sup>26</sup> Yu *et al.* (2019)<sup>27</sup> found that sulfates (measured at a distance of 30 meters from the aircraft turbine) could account for the majority of the PM mass emissions at high thrust.<sup>28</sup> However, the DEIR states (p. 4.1.1-2) that

“Sulfate compounds (e.g., ammonium sulfate) are generally not emitted directly into the air but are formed through various chemical reactions in the atmosphere; thus, sulfate is considered a secondary pollutant. All sulfur emitted by airport-related sources included in this analysis was assumed to be released and to remain in the atmosphere as SO<sub>2</sub>. No sulfate inventories or concentrations were estimated for the criteria air pollutant analysis because the relative abundance of sulfates from fuel combustion is much lower than that of SO<sub>2</sub>, and because very little sulfur is emitted from Project sources. However, the trace amounts of sulfates identified in jet fuel are assessed in Section 4.1.2, *Human Health Risk*.”

While *some* sulfate is certainly formed through chemical reactions in the atmosphere (and is therefore “secondary”), it is not categorically the case that all sulfate is a secondary pollutant. Therefore, the first sentence in the quotation above should be removed, and sulfate should not be categorically excluded from the PM inventory. The precise definition of “secondary” sulfate is an active topic of discussion; however, inventories of primary pollutants for ground-level combustion sources typically assume that at a minimum a small percentage of the fuel sulfur (2% or so) is converted to primary sulfate rather than being entirely converted to SO<sub>2</sub>. The DEIR does not provide evidence to support its assumption that sulfate compounds from aircraft would not contribute to PM 10 emissions or describe specifically how the PM emissions inventory was adjusted to remove sulfates. It should do so.

<sup>26</sup> Petzold et al., “Evaluation of Methods for Measuring Particulate Matter Emissions from Gas Turbines”, *Environ. Sci. Technol.* 2011, **45**, 3562–3568, dx.doi.org/10.1021/es103969v. This work was conducted with a jet fuel sulfur content of 300 ppmw = 0.030% (w/w).

<sup>27</sup> Zhenhong Yu, Michael T. Timko, Scott C. Herndon, Richard, C. Miake-Lye, Andreas J. Beyersdorf, Luke D. Ziemba, Edward L. Winstead, Bruce E. Anderson, “Mode-specific, semi-volatile chemical composition of particulate matter emissions from a commercial gas turbine aircraft engine,” *Atmospheric Environment*, Volume 218, 2019, 116974, ISSN 1352-2310, <https://doi.org/10.1016/j.atmosenv.2019.116974>.

<sup>28</sup> This was for JP-8 fuel (satisfying Jet A fuel specifications) with a sulfur content of 1148 ppmw (0.11% w/w).

6. Overall, the DEIR should clearly identify key details associated with the emissions calculations. It may be preferable to show a single sample calculation for the various calculation steps.



## **TODD M. TAMURA, QEP**

### **SUMMARY OF EXPERTISE**

Professional air pollution/GHG consultant for 27 years and a Planning Commissioner for Sonoma County. Diversified experience base that includes the preparation of CEQA/NEPA analyses/documentation, General and Transportation Conformity analyses, and permitting and compliance assurance for industrial facilities.

### **EDUCATION**

Massachusetts Institute of Technology, MS Technology and Policy, 1993

UCLA, MS Chemistry, 1990

Harvey Mudd College, BS Chemistry, 1988 (Distinction & Departmental Honors)

### **EMPLOYMENT HISTORY**

2005 – present: Founder and President, Tamura Environmental, Inc. (Petaluma, CA)

2016 – present: Planning Commissioner, Sonoma County (CA)

2005 – 2015: Supervising Seller-Doer (part-time), Tetra Tech, Inc. (Boston, MA)

2002 – 2005: Project Manager/Senior Scientist, Sonoma Technology, Inc. (Petaluma, CA)

1993 – 2002: Partner and Senior Project Mgr. (final position), Tech Environmental, Inc. (Waltham, MA)

### **OTHER PROFESSIONAL ACTIVITIES**

Air & Waste Management Association: Vice Chair, Editorial Advisory Committee, *EM* magazine, 2004-2007; Golden West (Northern California) Section Executive Board, 2005-2006; New England Section Executive Board, 1996-2002; member, 1993-present

Peer reviewer for *Atmospheric Environment*, *Journal of the Air & Waste Management Association*, the Transportation Research Board of the National Academies (Air Quality Committee), and US EPA (innovative research grant proposals for monitoring technologies)

Transportation Research Board of the National Academies, Transportation and Air Quality Committee (ADC20) Peer Reviewer/Affiliate Member, 2003-2016

CARB-accredited GHG inventory Lead Verifier (and Refineries Specialist), 2009-2018

IPEP-certified Qualified Environmental Professional (QEP), 1999-present

API Committee on Evaporative Loss Estimation (CELE) member, 2018-present

ASTM Committee member (D02 on Petroleum Products, Liquid Fuels, and Lubricants and D03 on Gaseous Fuels)

Forensic Expert Witness Association, Associate Member, 2011-2014

## EXAMPLES OF PROJECT EXPERIENCE

**Mobile Sources.** Completed several projects involving on-road mobile source emissions and dispersion modeling at individual roadways; multiple policy-relevant projects completed for the Federal Highway Administration (FHWA), including [a review of mobile source air toxics issues](#). Principal air consultant for multiple proposed marine liquefied natural gas (LNG) projects (including [Northeast Gateway](#)) and marine construction projects for offshore wind turbines (including [Block Island Wind Farm](#) and the Virginia Offshore Wind Technology Assessment Project that served as a precursor to [the Coastal Virginia Offshore Wind project](#)). Work included both EIR/EIS work and permit application documents. Recently completed an emissions screening analysis as part of a CEQA initial study for a proposed Bay Area commercial port project; developed a technical framework for evaluating PM deposition near airports; extensive work with permit applications for aeroderivative turbines for electric power production.

**Regulatory Agencies/Metropolitan Planning Organizations.** Prepared a two-day air toxics emissions inventory training course for US EPA Region 9 and presented to state and local agency personnel within the Region's jurisdiction. Reviewed the EIS for the Jordan Cove marine LNG terminal as a contractor to the Federal Energy Regulatory Commission (FERC). Evaluated control technology options (availability, cost, and impacts) for the San Joaquin Valley Unified Air Pollution Control District (SJVUAPCD), Rhode Island Department of Environmental Management, Mid-Ohio Regional Planning Commission (MORPC), and Mid-America Regional Council (MARC, Kansas City); developed emissions inventory methods documents for SJVUAPCD (including one for composting). Led a fast-track project to prepare a SIP Conformity Plan for Minneapolis-St. Paul for the Minnesota Pollution Control Agency.

**Communities.** Worked on behalf of a citizen's group (Save The Air in Nevada County) and their counsel (Shute, Mihaly & Weinberger) to evaluate an EIR for a proposed gold mining operation in a California location with a small air district. Recommended permit conditions for monitoring operations of a modified wastewater treatment plant and presented analysis results to a citizens group on behalf of the Town of North Andover (MA) Board of Health and its counsel (Ken Kimmell); assisted the Town with reviewing air pollution controls, monitoring data, and test data for a municipal solid waste incinerator located there. Prepared CEQA IS/MND studies of air quality/GHG for small water/wastewater infrastructure/maintenance projects for a variety of municipalities. Currently serving as a volunteer member of the Richmond – San Pablo AB617 Technical Advisory Group.

**State-Of-The Science Evaluations.** Lead author of the reports “Transportation and Particulate Matter: Assessment of Recent Literature and Ongoing Research”—which was the basis of [FHWA's Strategic Plan for Particulate Matter Research](#)—and the CEC PIER report “Air Quality Research Roadmap for Alternative Fuels”, each of which involved communication with numerous experts with different backgrounds. Author of [the report “Gap Analysis for Particulate Matter Emission Factors for Gas-Fired Combustion Sources and Large Compression-Ignition Engines”](#), which reviews details regarding the science and QA of PM emissions measurement as well as the development of emission factors.

**Electric power generation.** Prepared numerous feasibility studies, permit applications, compliance notebooks, due diligence evaluations (for mergers & acquisitions), and GHG verifications for electric utility and independent power producer (IPP) clients; completed a competitive evaluation of utilities with regard to Phase II Acid Rain Program requirements. Prepared the air/GHG portion of the EIS for the proposed 720-mile, 600 kV Plains & Eastern Clean Line Transmission Project high voltage direct current (HVDC) transmission line designed to have the capacity to transmit 3,500 MW of wind power.

**Western States Petroleum Association (WSPA) Bay Area Committee / Bay Area Refineries.** Principal air consultant to the committee since 2014. Participated in nearly all technical meetings between the District, WSPA, and the five Bay Area refineries—including but not limited to those involving technical details regarding the ongoing joint research regarding leak emissions from components in heavy liquid service, emissions inventories, and rule implementation—and led several of these. Served as a technical resource and communications resource, explaining the refineries' issues to the District and the District's perspective to the refineries. Assisted air staff at multiple individual refineries with various technical details, including those regarding emissions inventories (including explanatory documentation) and source test planning and review.

**Monitoring and Testing.** Planned, specified, coordinated, and/or supervised source testing at dozens of facilities; reviewed/critiqued over 100 stack test reports and associated analytical laboratory work. Extensive communications with stack testing experts and analytical laboratories regarding the details of sampling and analytical work. Multiple evaluations of continuous monitoring technologies. Served on five US EPA peer review panels for environmental monitoring technologies (innovative research grant proposals).

**Retail gasoline dispensing facilities.** Principal air consultant to two industry trade organizations with regard to these facilities since 2002, and currently working for a third. Completed two research studies, served as principal reviewer of research by CARB and other parties, attended many meetings between WSPA and CARB's Monitoring and Laboratory Division, and presented technical issues regarding Enhanced Vapor Recovery (EVR) in a meeting with the CARB Executive Officer (Catherine Witherspoon) and WSPA President.

**Air Emissions from Waste Reuse/Conversion.** Surveyed air emissions for municipal wastewater sludge-to-fertilizer facilities across the United States and conducted an extensive 5-year evaluation of air pollution control equipment (through source testing) for one such facility owned by the Massachusetts Water Resources Authority. Critically evaluated multiple solid waste conversion technologies with regard to energy balances and associated air emissions. Conducted due diligence work for the acquisition of municipal wastewater sludge incinerators.

# EXHIBIT 1

SHUTE MIHALY  
& WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102  
T: (415) 552-7272 F: (415) 552-5816  
www.smwlaw.com

JOSEPH D. PETTA  
Attorney  
Petta@smwlaw.com

November 24, 2020

*Via E-Mail and U.S. Mail*

Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

Re: Public Records Act Request

To Whom It May Concern:

Pursuant to the California Public Records Act, Gov't Code § 6250 et seq., and Article 1, Section 3 of the California Constitution (collectively "PRA"), I hereby request on behalf of the City of El Segundo ("El Segundo") that your office provide copies of, or make available for copying, all documents held by Los Angeles World Airports ("LAWA") containing any of the following:

1. The Draft Environmental Impact Report for the Los Angeles International Airport ("LAX") Airfield & Terminal Modernization Project ("ATMP DEIR") states that the ATMP (the "Project") "would help LAX to prepare early for the continued aviation growth that is projected by LAWA, SCAG, and the FAA to occur at LAX over the next several decades," and is "integral to Los Angeles' plans to host the 2028 Olympic and Paralympic Games." Please provide:
  - a. Written communications between airline operators and LAWA, from January 1, 2019 or after, regarding the need for passenger gates at "Concourse 0" described in the ATMP DEIR, including but not limited to for the purpose of serving demand related to the 2028 Olympics.
  - b. Written communications between airline operators and LAWA, from January 1, 2019 or after, regarding the need for passenger gates at "Terminal 9" described in the ATMP DEIR, including but not limited to for the purpose of serving demand related to the 2028 Olympics.
2. Documentation supporting the statements in the ATMP DEIR that "demand for air travel and airline activity is expected to grow consistent with the parameters used in developing the aviation forecasts for the proposed [ATMP] Project," and that these forecasts "are still valid and relevant for the long-term planning

November 24, 2020

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- purposes of the [ATMP DEIR]” (*see* “Preamble”, ATMP DEIR), despite the fact that these forecasts were completed prior to the COVID-19 pandemic.
3. The ATMP DEIR states that without the ATMP, the existing facilities at LAX (including projects fully approved and entitled, but not yet built) could accommodate up to 127.9 million annual passengers (“MAP”) by 2045. Please provide all documents supporting the statement that existing facilities could accommodate 127.9 MAP, including, but not limited, to evidence for the statement on p. 4-6 of Appendix B.1 to the DEIR that “existing and planned terminal facilities would provide adequate processing facilities for all existing and planned passenger gates in FY 2028 and FY 2033.”
  4. The ATMP DEIR states that, without the Project, the airfield at LAX will experience approximately 15 minutes of annualized average all-weather delay in or around 2031 (*see, e.g.*, p. 4-4 of Appendix B.1 to the DEIR), and approximately 18 minutes of annualized average all-weather delay in or around 2045 (*see, e.g.*, p. 4-9 of Appendix B.1 to the DEIR). Please provide all documents showing that construction of the ATMP, including the proposed improvements to the airfield, would not have the effect of causing this operational delay to occur later than if the Project were not built.
  5. Documentation regarding any policies, guidelines or regulations currently in effect and applicable to the use of the West Remote Gates at LAX.
  6. Documentation from January 1, 2010, or after, regarding proposed design and/or construction of the length of taxiway described in the ATMP DEIR as the “Taxiway C extension.”
  7. Communications between LAWA and the California Air Resources Board, and/or Southern California Air Quality Management District, in connection with the ATMP, as referenced at p. 4.1.1-5 of the DEIR.

For the purposes of this request, the terms “document” or “documentation” include, but are not limited to, any written material (including material on the internet), facsimile, e-mail, photograph, map, data, report, videotape, audiotape, note of telephone call or meeting, factual or legal analysis, and any and all correspondence and memoranda in any written form, or other information that would be an agency record subject to the requirements of the PRA when maintained by an agency in any format, including an electronic format. All references in this PRA request to LAWA include, but are not limited to, LAWA’s consultants, employees, officers, and attorneys and any other person or entity contracted to do business on their behalf.



November 24, 2020

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Pursuant to Government Code section 6253(c), please make a determination on and respond to this request within 10 days of your receipt of it. If you determine that any of the information is exempt from disclosure under the Public Records Act, we ask that you ensure that your determination is consistent with Proposition 59, enacted on November 3, 2004. Proposition 59 amended the state Constitution to require that all exemptions from disclosure of public records be “narrowly construed.” Cal. Const. art. I, § 3(b)(2).

If you nonetheless determine that the requested records are subject to an exemption that remains valid after enactment of Proposition 59, we further request that: (1) you exercise your discretion to disclose some or all of the records notwithstanding the exemption; and (2) pursuant to Government Code section 6257, with respect to records containing both exempt and non-exempt content, you redact the exempt content and disclose the rest.

Finally, should you deny part or all of this request, you are required, pursuant to Government Code section 6255, to provide a written response describing the legal authority or authorities on which you rely. If such a response is necessary, please also address how your claim of exemption is consistent with Proposition 59.

If I can provide any other clarification that will help expedite your attention to this request, please contact me at (415) 552-7272 or [petta@smwlaw.com](mailto:petta@smwlaw.com). See Gov’t Code § 6253.1 (requiring public agency to contact and provide assistance to members of the public making a request that may be denied). Please do not perform any duplication before notifying me, so that our client may decide which records should be copied. If you maintain any of these documents in an electronic format (e.g., e-mails, PDFs, excel spreadsheets), please notify me so we can discuss how to best provide these documents to my client.

Thank you for your attention to this request.

Very truly yours,  
SHUTE, MIHALY & WEINBERGER LLP



Joseph “Seph” Petta

cc: Scott Mitnick, City of El Segundo

SHUTE MIHALY  
& WEINBERGER LLP

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JOSEPH D. PETTA  
Attorney  
Petta@smwlaw.com

December 22, 2020

Via E-Mail

Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045

Re: November 24, 2020 Public Records Act Request re: LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report

To Whom It May Concern:

We received Los Angeles World Airports' ("LAWA") December 18, 2020 response to our November 24, 2020 request under the California Public Records Act ("PRA") on behalf of the City of El Segundo. As of today's date, LAWA has responded to just one of the records requests in our November 24 letter, providing just two documents. On December 18, LAWA requested a second 14-day extension of the statutory deadline to disclose the requested records. If LAWA needs clarification regarding the scope of our November 24 request, please let us know immediately. Otherwise, we expect a complete response to our request no later than January 1, 2021.

In addition, please note that our November 24 request for "Documentation from January 1, 2010, or after, regarding proposed design and/or construction of the length of taxiway described in the ATMP DEIR as the 'Taxiway C extension'" includes, but is not limited to, the *Runway 25R & Taxiway B East End Rehabilitation and Taxiway C Extension Preliminary Engineer's Report*, 2011, prepared by HNTB and listed in chapter "8.0: References" of the Revised Draft Environmental Impact Report for the LAX Runway 7L/24R RSA and Associated Improvements Project. This public record is clearly identified and within LAWA's possession. Thus, pursuant to the PRA, please provide this document without further delay. Please note that we are requesting that document and others included in our November 24, 2020 request to prepare our comments on LAWA's Draft EIR for the LAX Airfield and Terminal Modernization Project ("ATMP DEIR"). That comment period currently expires on February 12, 2021. If LAWA does not provide a complete and timely response to our November 24, 2020 request, we will need additional time to prepare our comments on the ATMP DEIR.

Very truly yours,  
SHUTE, MIHALY & WEINBERGER LLP



Joseph "Seph" Petta

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JOSEPH D. PETTA  
Attorney  
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February 1, 2021

**Via E-Mail**

Los Angeles World Airports  
1 World Way  
Los Angeles, CA 90045  
Email: [publicrecordsrequest@lawa.org](mailto:publicrecordsrequest@lawa.org)

Re: Public Records Act Request re: LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report

To Whom It May Concern:

Pursuant to the California Public Records Act, Gov't Code § 6250 et seq., and Article 1, Section 3 of the California Constitution (collectively "PRA"), I hereby request on behalf of the City of El Segundo ("El Segundo") that your office provide copies of, or make available for copying, all documents held by Los Angeles World Airports ("LAWA") as described below. Please note that we are requesting the documents described below, and others included in our November 24, 2020 and December 22, 2020 requests (collectively CPRA request), to prepare our comments on LAWA's Draft EIR for the LAX Airfield and Terminal Modernization Project ("ATMP DEIR").

1. LAWA previously produced a document titled/dated "Southwest Airlines Terminal 1 East, CDO & TDIP DED Briefing, January 15, 2020" ("January 15, 2020 SWA PPT") in response to our CPRA request. Please provide any other documents related to that January 15, 2020 meeting and any other communications LAWA has had with Southwest Airlines regarding the topics described in the January 15, 2020 SWA PPT.
2. The January 15, 2020 SWA PPT includes the following statement on page 5: "Image is from June 2019 Network Planning Briefing to LAWA." Please produce that referenced 2019 Network Planning Briefing in its entirety.
3. The January 15, 2020 SWA PPT includes, on pages 5 and 6, images from a January 2017 Long Term Development Strategy Briefing to LAWA. Please produce that January 2017 briefing in its entirety.

February 1, 2021

Page 2

4. The January 15, 2020 SWA PPT includes an image on page 14 titled: “LAX Concourse 0 Project Definition Book (October 31, 2016).” Please produce that document in its entirety.
5. The January 15, 2020 SWA PPT includes images on page 17 titled: “Studied Number of Airfield Layouts.” Please produce those images and all associated study documents in their entirety.
6. LAWA previously produced a document titled/dated “Southwest Airlines Terminal 1 East Program Schedule Briefing (February 27, 2020)” (“February 27, 2020 SWA PPT”) in response to our CPRA request. Please provide any other documents related to that February 27, 2020 meeting and any subsequent communications LAWA has had with Southwest Airlines regarding the project schedule and/or other issues described in the February 27, 2020 SWA PPT.
7. LAWA previously produced emails referencing an October 20, 2020 meeting between LAWA and AvAirPros and/or Southwest Airlines regarding the ATMP DEIR. Please provide all documents related to that meeting.
8. LAWA previously produced a document titled/dated “United Airlines Briefing (October 8, 2020)” (“October 8, 2020 United PPT”) in response to our CPRA request. Please provide any other documents related to that October 8, 2020 meeting and any other communications LAWA has had with United regarding the topics described in the October 8, 2020 United PPT.
9. LAWA previously produced a document titled/dated “LAX Terminal 9 NASIP Update (June 14, 2018)” (“June 14, 2018 United PPT”) in response to our CPRA request. Please provide any other documents related to that June 14, 2018 meeting and any other communications LAWA has had with United regarding the topics described in the June 14, 2018 United PPT.
10. The June 14, 2018 United PPT includes a reference on page 4 to a “Program Definition Book” issued to LAWA on May 7. Please produce that document in its entirety.
11. The June 14, 2018 United PPT includes a reference on page 4 to LAWA workshops to review the “Program Definition Book.” Please produce all documents related to those workshops.
12. The staff report for item #12 on the agenda for the January 7, 2021 meeting of the Board of Airport Commissioners (“BOAC”) states that pursuant to the proposed action, once the 80,700-square-foot parcel (“Parcel A1” on Location Map 2 attached to the January 7, 2021 meeting agenda) is removed from the FedEx lease at 7401 World Way West at LAX, LAWA will use this parcel for “critical aircraft parking demands, including the potential lease to airlines in need of such parking.” Please provide all documents

February 1, 2021  
Page 3

describing the referenced “critical aircraft parking demands,” including but not limited to communications from airlines referencing their need for aircraft parking at LAX.

13. Our December 22, 2020 request asked LAWA to provide the *Runway 25R & Taxiway B East End Rehabilitation and Taxiway C Extension Preliminary Engineer’s Report*, 2011, prepared by HNTB and listed in chapter “8.0: References” of the Revised Draft Environmental Impact Report for the LAX Runway 7L/24R RSA and Associated Improvements Project. We still do not see this public record among LAWA responses to the CPRA request. This public record is clearly identified and within LAWA’s possession. Thus, pursuant to the PRA, please provide this document without further delay, or provide a justification for withholding this record.
14. LAWA previously produced a document titled/dated “LAWA North Airfield Safety Improvement Project (NASIP) – Operational Assessment – Planning Level Review – Participants’ Guidance, October 25, 2018” (“October 25, 2018 Participants’ Guidance”) in response to our CPRA request. Please provide any other documents related to that October 25, 2018 meeting, including any reports, in draft and/or final form, created in connection with the meeting and any other communications LAWA has had with the meeting participants regarding the topics described in the October 25, 2018 Participants’ Guidance.

For the purposes of this request, the terms “document” or “documentation” include, but are not limited to, any written material (including material on the internet), facsimile, e-mail, photograph, map, data, report, videotape, audiotape, note of telephone call or meeting, factual or legal analysis, and any and all correspondence and memoranda in any written form, or other information that would be an agency record subject to the requirements of the PRA when maintained by an agency in any format, including an electronic format. All references in this PRA request to LAWA include, but are not limited to, LAWA’s consultants, employees, officers, and attorneys and any other person or entity contracted to do business on their behalf.

Pursuant to Government Code section 6253(c), please make a determination on and respond to this request within 10 days of your receipt of it. If you determine that any of the information is exempt from disclosure under the Public Records Act, we ask that you ensure that your determination is consistent with Proposition 59, enacted on November 3, 2004. Proposition 59 amended the state Constitution to require that all exemptions from disclosure of public records be “narrowly construed.” Cal. Const. art. I, § 3(b)(2).

If you nonetheless determine that the requested records are subject to an exemption that remains valid after enactment of Proposition 59, we further request that: (1) you exercise your discretion to disclose some or all of the records notwithstanding the exemption; and (2) pursuant to Government Code section 6257, with respect to records containing both exempt and non-exempt content, you redact the exempt content and disclose the rest.

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Page 4

Finally, should you deny part or all of this request, you are required, pursuant to Government Code section 6255, to provide a written response describing the legal authority or authorities on which you rely. If such a response is necessary, please also address how your claim of exemption is consistent with Proposition 59.

If I can provide any other clarification that will help expedite your attention to this request, please contact me at (415) 552-7272 or [petta@smwlaw.com](mailto:petta@smwlaw.com). See Gov't Code § 6253.1 (requiring public agency to contact and provide assistance to members of the public making a request that may be denied). Please do not perform any duplication before notifying me, so that our client may decide which records should be copied. If you maintain any of these documents in an electronic format (e.g., e-mails, PDFs, excel spreadsheets), please notify me so we can discuss how to best provide these documents to my client.

Thank you for your attention to this request.

Very truly yours,  
SHUTE, MIHALY & WEINBERGER LLP



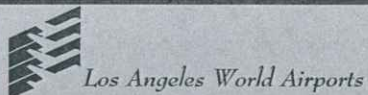
Joseph "Seph" Petta

cc: [gstreeter@lawa.org](mailto:gstreeter@lawa.org)

1327244.5

# EXHIBIT

# 2



Item Number here 14

REPORT TO THE BOARD OF AIRPORT COMMISSIONERS

Robert Falcon

Approved by: Robert Falcon, Deputy Executive Director

[Signature]

Reviewed by: Bernardo Gogna, Chief Development Officer

D. Dy

City Attorney

[Signature]

Justin Erbacci – Chief Executive Officer

Meeting Date:

12/10/2020

CAO Review:

- Completed
Pending
N/A

Table with 4 columns: Reviewed for, Date, Approval Status, By. Rows include Finance, CEQA, Procurement, Guest Experience, Strategic Planning.

SUBJECT: Award of Principal Architect and Principal Engineer Contract to HOK+Arup for On-Call Planning and Design Services for an amount not-to-exceed \$50,000,000.

Award of a three-year contract, with two (2) one-year options, to HOK+Arup for On-Call Planning and Design Services in the not-to-exceed amount of \$50,000,000.

RECOMMENDATIONS:

Management RECOMMENDS that the Board of Airport Commissioners:

- 1. ADOPT the Staff Report.
2. DETERMINE that this action is exempt from the California Environmental Quality Act (CEQA) pursuant to Article II, Section 2.f. of the Los Angeles City CEQA Guidelines and is not considered a Project under State CEQA Guidelines Section 15378(b)(2).
3. FIND that the work can be performed more economically or feasibly by an independent contractor than by City employees.
4. APPROVE the award of contract in the not-to-exceed amount of \$50,000,000 to HOK+Arup for on-call planning and design services.
5. APPROPRIATE funds in the amount of \$25,000,000 for the first round of planning and design efforts.



6. AUTHORIZE the Chief Executive Officer to execute the contract with HOK+Arup upon approval as to form by the City Attorney and approval by the Los Angeles City Council.

## **DISCUSSION:**

### **1. Purpose**

The purpose of this Principal Architect and Principal Engineer contract is to support Los Angeles World Airports (LAWA) in advancing the planning and design of potential capital investment projects being initiated in the next 3-5 years.

Known areas of interest include, but are not limited to, potential cargo improvements, potential airfield improvements, potential terminal modernizations and a series of other potential capital improvements (airside, landside, terminals, utilities, etc.).

### **2. Prior Related Actions**

- **July 30, 2020 – Board Resolution No. 27080 (DA-5201, DA-5202, DA-5203, DA-5204, DA-5205)**

The Board considered and approved the staff recommendation to extend the term of five (5) existing on-call architectural contracts by twelve months, to allow for the parallel procurement and onboarding of a new Principal Architect and Principal Engineer.

### **3. Current Action**

#### **Background**

From 2009-2019, annual passenger activity at Los Angeles International Airport (LAX) grew from 57 million to over 88 million. Amidst this growth in air-service demand, LAWA embarked on a multi-billion-dollar Capital Improvement Program to deliver “Gold Standard” facilities and provide a world class guest experience.

LAWA already has begun executing over \$10 Billion in construction projects at LAX. This includes the Landside Access Modernization Program, the Midfield Satellite Concourse Program, the Runway Safety Area Improvement Program, the Terminal Development and Improvement Program, and several other large modernization programs.

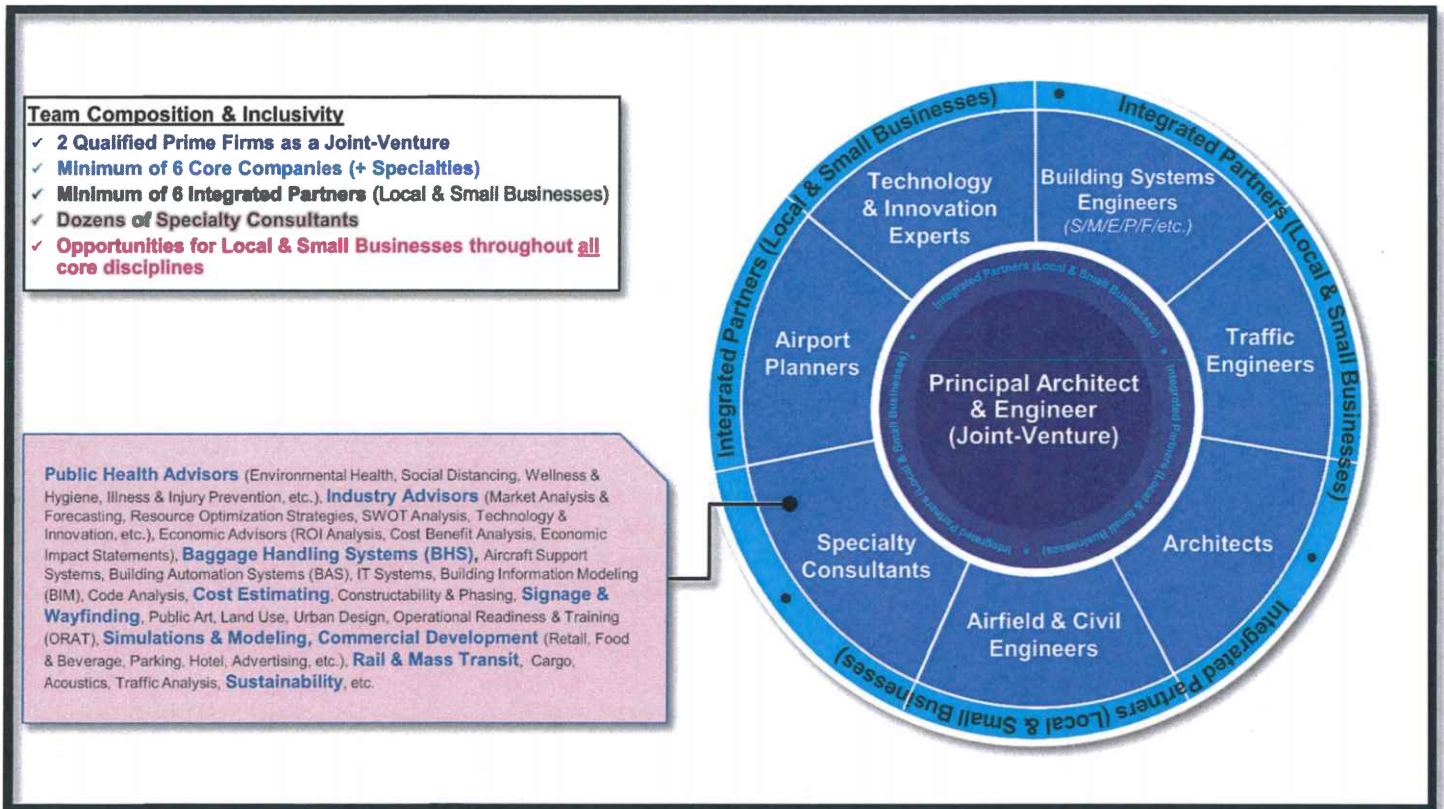
However, in 2020, the COVID-19 pandemic dramatically impacted the global aviation industry. By March 31, daily commercial air service enplanements in the United States were down by over 90% from the prior year, and much of LAWA’s workforce had transitioned to telecommuting. This unique challenge has required LAWA to re-invent our processes, priorities, and the methodical allocation of our limited resources.

With this challenge in mind, the proposed contract offers to assist LAWA with complex airport planning decisions as we navigate through this transitional period. These critical planning and design efforts will assist LAWA with redefining our Capital Improvement Program as we prepare for the City of Los Angeles to host the 2028 Summer Olympic Games.

## Contracting Strategy

This contracting opportunity was specifically crafted to ensure that our Principal Architect and Engineer – and the work they produce – is reflective of the **diversity and inclusion** of our city, our airport, and the passengers that we serve.

To that end, LAWA required that each Proposer Team be led by a Joint-Venture between an Architecture Firm and an Engineering Firm, supported by a minimum of 6 “Key Discipline” Firms, with a minimum of 6 additional “Integrated Partner” Firms as shown below.



As a result, over 600 people attended our first outreach event, and industry-engagement continued to grow from there. Ultimately, the eight final proposals we received were comprised of over 100 companies, including some of the most qualified and talented personnel from the global aviation industry.

The successful Proposer Team, led by HOK+ARUP, includes over 30 companies with a wide range of unique credentials and experience. The Team may also onboard additional firms throughout the duration of the contract as new needs and opportunities arise.

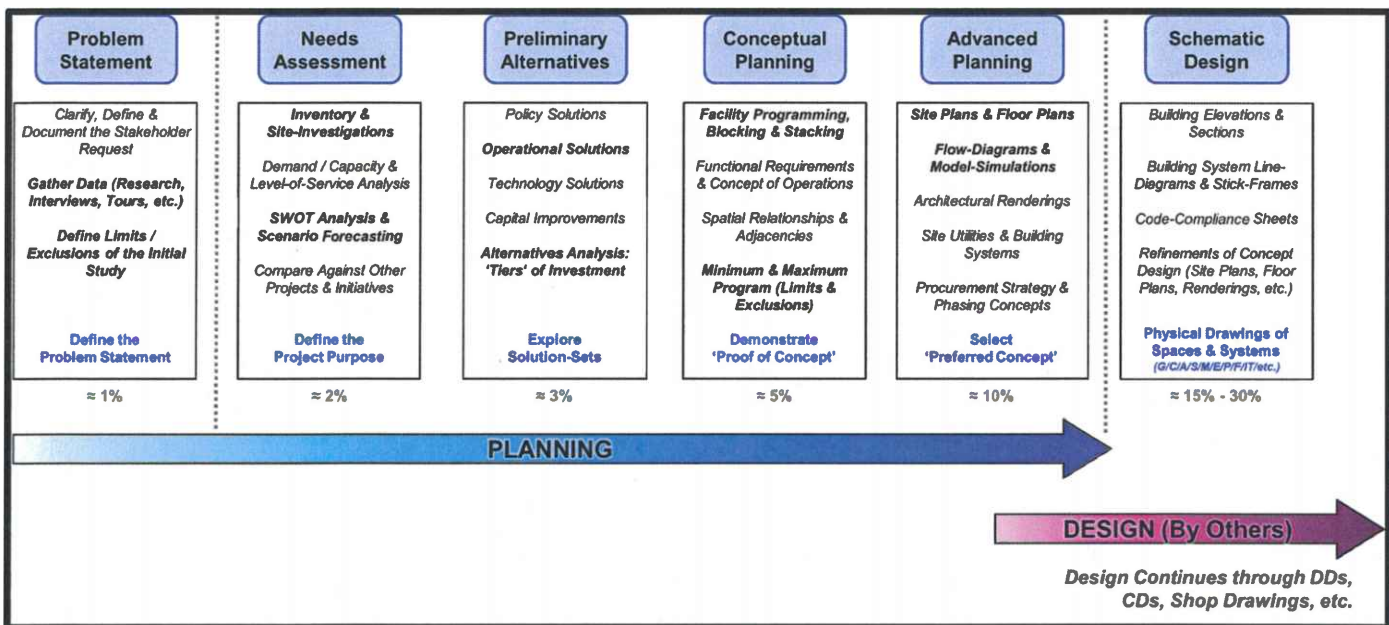
With this contract, the HOK+Arup Team will support LAWA by providing a holistic architectural and engineering viewpoint and by integrating capital improvement projects throughout the LAX campus to ensure they are aligned with our overall vision. The HOK+Arup Team will help LAWA to ensure that we deliver a cohesive capital improvement program, where each project contributes to our overarching goals. However, this is not an exclusive contract for comprehensive design services for our entire Capital Program. Many of the deliverables produced by the HOK+Arup Team will assist LAWA in obtaining competitive price-proposals from design-builders, developers, and/or other designers, depending on the scope, scale, complexity, urgency and importance of each project.

## Scope of Services

Through this contract, HOK+Arup will provide LAWA a wide variety of planning and design services on an as-needed basis. This may include, but not be limited to, potential cargo improvements, airfield improvements, terminal modernizations, and a wide variety of other potential projects that may contribute to LAWA's goals regarding safety, sustainability, resiliency, efficiency, flexibility, innovation, community, and/or guest experience.

Services on this contract will be provided on a Task Order basis. LAWA will issue discrete requests for Task Order proposals on an as needed basis. Each Task Order proposal will include a detailed description of the specific services and deliverables required, a work plan and schedule for completing each task, and a "schedule of values" for the proposed costs associated with each task and deliverable.

Through this contract, HOK+Arup may assist LAWA with validating the feasibility, constraints, costs, and benefits of each potential project as shown in the flowchart below. If and when further planning and design is needed for a proposed capital investment, HOK+Arup may further assist LAWA with developing preliminary alternatives, establishing a 'proof of concept', and preparing a conceptual design package for each proposed project. LAWA's executive team will receive monthly progress reports on each task to ensure ample engagement and oversight.



### How this action advances a specific strategic plan goal and objective

This action advances this strategic goal and objective: Deliver Facilities & Guest Experiences that are Exceptional: Plan collaboratively to improve guest services while delivering capital improvements. The proposed contract will provide LAWA with unique expertise from multiple industries to ensure that our Capital Improvement Program will meet needs of our passengers, airlines, and industry partners, as our needs and priorities evolve over time, to adapt to our changing operating environment.

## Procurement Process

In order to increase interest and participation on this procurement, staff held a series of outreach events with the industry to discuss the procurement, and LAWA's new approach to on-call design. Virtual events were held on September 22, September 29, and October 6. Attendance at these events were significant, with around 400 average log-ins for the September 29 and October 6 events. The events presented LAWA's approach and answered questions from the industry. On September 29, 2020, staff released a draft Request for Proposals on Los Angeles Business Assistance Virtual Network for event attendees to review. Following feedback and adjustments, staff uploaded the final Request for Proposal to Los Angeles Business Assistance Virtual Network on October 6, 2020. On October 8, 2020, staff held a pre-proposal conference for the project, and approximately 150 guests logged into the virtual conference. Following LAWA's outreach efforts, eight (8) proposals were received by the due date of October 28, 2020, from a strong listing of firms:

1. Fentress Architects | T.Y. Lin International
2. Foster + Partners | Stantec
3. HOK+Arup
4. LANEXT (AECOM-Gensler-JGM)
5. Morphosis Architects
6. Mott MacDonald / Grimshaw Architects (MMGA JV)
7. SOM+HNTB
8. WSP USA and KPF Joint Venture

All proposers passed the Administrative Requirements review conducted by the Procurement Services Division. The proposals were evaluated in accordance with the following criteria established in the Request for Proposals:

| PARTS     | CRITERIA DESCRIPTION                   | Criteria Score / Weight |           |                     |                                    |
|-----------|--|-------------------------|-----------|---------------------|------------------------------------|
|           |  | Max Review Score        | Weight    | Max Weighted Points | Minimum Qualifying Weighted Score* |
| <b>A</b>  | <b>ADMINISTRATIVE REQUIREMENTS</b>     |                         |           |                     |                                    |
|           | Administrative Submittal               | Pass/Fail               |           |                     |                                    |
| <b>B</b>  | <b>TECHNICAL CRITERIA</b>              | Max Review Score        | Weight    | Max Weighted Points | Minimum Qualifying Weighted Score* |
| <b>B1</b> | <b>B. Minimum Qualifications</b>       | Pass/Fail               |           |                     |                                    |
| <b>B2</b> | C. Firm Experience                     | 10                      | 20        | 200                 |                                    |
|           | D. Key Personnel                       | 10                      | 15        | 150                 |                                    |
|           | E. Inclusivity and Outreach Plan       | 10                      | 10        | 100                 |                                    |
|           | F. Team Structure                      | 10                      | 10        | 100                 |                                    |
|           | <b>SUB-TOTAL POINTS</b>                |                         |           | <b>550</b>          | <b>440</b>                         |
|           | <b>INTERVIEW</b>                       | <b>10</b>               | <b>20</b> | <b>200</b>          | <b>160</b>                         |
|           | <b>TOTAL WEIGHTED TECHNICAL POINTS</b> |                         |           | <b>750</b>          | <b>600</b>                         |
| <b>C</b>  | <b>COST PROPOSAL</b>                   |                         |           |                     |                                    |
|           | Proposed Multipliers                   | <b>250</b>              |           |                     |                                    |

\*LAWA may elect to modify, or forego, a minimum qualifying score based on the number of proposals and/or other operational considerations in the best interest of LAWA.

## Written Proposal Results

Written Technical Proposals were first evaluated by the selected Evaluation Committee. The Evaluation Committee was comprised of the following panel members of City of Los Angeles staff and Los Angeles County Metropolitan Transportation Authority (Metro) staff:

- Chief Development Officer
- Chief Environmental and Sustainability Officer
- Deputy Executive Director, Development
- Chief Airport Planner II
- Senior Executive Officer, Los Angeles Metro

The Committee reviewed the proposals for their response to the criteria outlined above. At the end of this review, the Evaluation Committee provided the following scores for the proposing firms:

| Technical Proposal Score (550 Points) |                                |       |
|---------------------------------------|--------------------------------|-------|
| Rank                                  | Proposer Name                  | Score |
| 1                                     | HOK+Arup                       | 515.5 |
| 2                                     | MMGA JV                        | 507.5 |
| 3                                     | LANEXT                         | 482   |
| 4                                     | SOM+HNTB                       | 462.5 |
| 5                                     | Foster + Partners   Stantec    | 423   |
| 6                                     | WSP USA and KPF JV             | 410.5 |
| 7                                     | Fentress Architects   T.Y. Lin | 406   |
| 8                                     | Morphosis Architects           | 312   |

## Interview Proposal Results

Following review of the written technical scores and discussions with the Evaluation Committee, it was agreed that LAWA would invite the top four (4) firms to interview. Interviews were held on November 18, 2020, and November 19, 2020, via WebEx. Following the interviews, the Evaluation Committee scored the firms as described below:

| Interview Proposal Score (200 Points) |               |       |
|---------------------------------------|---------------|-------|
| Rank                                  | Proposer Name | Score |
| 1                                     | HOK+Arup      | 191.3 |
| 2                                     | MMGA JV       | 185.1 |
| 3                                     | SOM+HNTB      | 155.8 |
| 4                                     | LANEXT        | 151.4 |

## Cost Proposal Results

In the Request for Proposals, LAWA reserved the right to further shortlist the teams following the interviews. After review of the scores and discussions with the Evaluation Committee, it was determined that LAWA would exercise this option and only invite the top two (2) teams that achieved the 160-point threshold established in the Request for Proposals to submit pricing. The invited teams both cleared this minimum 160-point

threshold.. Staff received cost proposal submissions from HOK+Arup and MMGA JV on November 24, 2020. Cost proposals were weighted in accordance with the following:

| Role on the Team            | Points     |
|-----------------------------|------------|
| Principal Architect         | 75         |
| Principal Engineer          | 75         |
| Key Discipline Leads (Avg.) | 75         |
| Integrated Partners (Avg.)  | 25         |
| <b>Total</b>                | <b>250</b> |

Following calculations of the cost proposals, the points were allocated as follows:

| Cost Proposal Score (250 Points) |               |               |
|----------------------------------|---------------|---------------|
| Multiplier Level                 | HOK+Arup      | MMGA JV       |
| Principal Architect              | 75            | 73.06         |
| Principal Engineer               | 65.28         | 75            |
| Key Discipline (Avg.)            | 75            | 58.63         |
| Integrated Partner (Avg.)        | 24.99         | 25            |
| <b>Total Cost Proposal Score</b> | <b>240.27</b> | <b>231.69</b> |

### Final Ranking

After the completion of all phases of the procurement process, staff calculated the final points and arrived at the following:

| Final Ranking (1,000 Points) |               |        |
|------------------------------|---------------|--------|
| Rank                         | Proposer Name | Score  |
| 1                            | HOK+Arup      | 947.07 |
| 2                            | MMGA JV       | 924.29 |

LAWA's Procurement Services Division established inclusivity goals of 25% (SBE), 7% (LBE), 5% (LSBE), and 3% (DVBE). The HOK+Arup team pledged 25% (SBE), 7% (LBE), 5% (LSBE), and 3% DVBE. The HOK+Arup team also listed several additional commitments to inclusion in their proposal, including but not limited to, mentorships, scholarships, and knowledge transfer programs, that will become part of their contract with LAWA. Both HOK and Arup are Local Business Enterprises certified by the City of Los Angeles. HOK has been operating its local Los Angeles office for nearly 40 years, while Arup has been serving Los Angeles for over a decade. Together, HOK and Arup employ over 350 people in their Los Angeles offices, including 18 professionally licensed architects and 69 professionally licensed engineers in Los Angeles County. Further to their commitments to diversity and inclusion, HOK+Arup has put together a team that is well represented in all disciplines by local, local small, disadvantaged, and other business enterprises that serve the greater Los Angeles Area. This can be seen with the makeup of the HOK+Arup team:

## Airside and Civil Engineering

Atkins\*  
IDS (SBE)  
EW Moon (LSBE)  
VCA (LSBE/DBE/MBE)

## Traffic Engineering

Arup (LBE)\*  
FPL & Associates (SBE/DBE)  
MA Engineering (LSBE/DBE/DVBE)  
Psomas (LBE)  
CHS Consulting (SBE/DBE)

## Innovation and Technology

Faith Group (DBE/WBE)\*  
Creelman, Inc. (LSBE/DBE)  
UNStudio  
UNSense

## Architecture

HOK (LBE)\*  
Rivers & Christian (LSBE)  
Iron Horse (SBE/DBE/WBE)  
Paul Murdoch Architects (LSBE)  
Anderson-Barker (SBE/MBE)

## Planning

Ricondo and Associates\*  
Connico (SBE/DBE/WBE)  
UPLA (LSBE/DBE/WBE)

\*Key Discipline Lead

## Building Systems (MEP/S)

Syska Hennessy (LBE)\*  
PBS (LSBE/MBE/DBE)  
Walter P. Moore  
Labib+Funk  
Triunity (SBE/DBE/MBE)  
Schwab Associates (LSBE/DVBE)

## Emerging Issues

Polytechnique (SBE/DBE)\*  
UCLA  
Skylark  
IMD (DBE)

## Business Case

Frasca (SBE)\*  
Leyland Saylor (DVBE)  
Faithful + Gould

## LA28

The Todd Group\* (MBE)  
Premis Communications (LSBE/WBE/MBE)  
HR&A

## Other Specialties

Studio-MLA (LSBE/DBE)\* *Landscape Arch*  
Michelle Isenberg *Public Art*  
GCC & Associates (DVBE/SBE/MBE)  
*Constructability and Phasing*  
C&S Companies *Environmental*

As the Principal Architect and Principal Engineer, HOK+Arup will guide and coordinate the design principles of LAWA. However as seen in the organization of their team, the joint venture will have to rely heavily on their integrated partners to complete tasks under this contract, and to meet the increased inclusivity requirements established on this contract. With over twenty-five (25) certified firms on its team, eleven (11) of which are certified LSBEs, and the opportunity to add more as specialty tasks are assigned, the HOK+Arup team is positioned to provide real opportunities for SBE, LBE, LSBE, and DVBE firms in Los Angeles.

The Evaluation Committee believed HOK+Arup provided the best team after reviewing their written proposal and interviewing the firms. HOK+Arup's price was the most competitive of the firms qualified to submit a cost proposal. In a pool of highly talented teams, the HOK+Arup team was able to showcase their expertise and a strong team that displayed a firm understanding of LAWA's goals, strong previous experience with similar projects to those contemplated under this contract, and a compilation of highly skilled personnel that bring global as well as extensive local knowledge. Based on these evaluations, staff recommends awarding a contract for Principal Architect/Engineer services to HOK+Arup.

## ***Action Requested***

Staff requests the Board approve the award of contract to HOK+Arup for an amount not-to-exceed \$50,000,000, for on-call planning and design services, and appropriate funds in the amount of \$25,000,000 for the first round of planning and design efforts.

## ***Fiscal Impact***

LAWA may use a combination of operating and capital funds for this contract. LAWA's 10-Year Capital Improvement Plan (CIP) already includes programming budget to perform studies for potential upcoming capital projects. A portion of that existing budget will be used for tasks issued under this contract, along with additional capital budget that may be programmed in the future for new studies authorized under LAWA's study and project approval process.

Upon the completion of the studies, planning and designing services performed under this contract, the cost of such services for projects that result in a follow up phase, including but not limited to, developing preliminary alternatives, establishing a 'proof of concept', or preparing a Conceptual Design Package for each proposed project, will be capitalized as part of the respective capital project. On the other hand, the cost of such studies, planning and designing services for projects that do not materialize will be expensed and paid out of LAWA's Operating Budget.

## **4. Alternatives Considered**

- ***Take No Action***

If LAWA takes no action, then the planning and design of several large capital projects effectively would be delayed or placed on hold, and those projects may not be delivered prior to the 2028 Olympics.

- ***Procure Separate Services for Each Individual Project***

LAWA would not get the benefits of having an aligned, consistent and integrated approach to the design and engineering of capital improvement projects, which likely is to result in unaligned, ad-hoc projects, the integration of which likely would be very complex and costly – if even achievable. The alternative approach also would require 10+ separate procurement efforts for individual planning and design efforts ranging from \$50K - \$5 Million. This would further require 10+ times the contract administration resources, and an additional layer of program management to coordinate efforts between multiple separate contracts.

## **APPROPRIATIONS:**

Funds for FY2020-21 are already available as part of the Capital Improvement Program through the Capital Governance Process.

Staff will return in subsequent years for an accounting of funds expensed-to-date, and a request for future appropriations, as needed.

## **STANDARD PROVISIONS:**



1. This action, as a continuing administrative activity, is exempt from California Environmental Quality Act (CEQA) requirements pursuant to Article II, Section 2.f. of the Los Angeles City CEQA Guidelines and is not considered a Project under State CEQA Guidelines Section 15378(b)(2).
2. This proposed document(s) is/are subject to approval as to form by the City Attorney.
3. Actions taken on this item by the Board of Airport Commissioners will become final pursuant to the provisions of Los Angeles City Charter Section 373.
4. HOK+Arup will comply with the provisions of the Living Wage Ordinance.
5. Procurement Services has reviewed this action (File No. 9602) and established a mandatory 25% Small Business Enterprise (SBE), 7% Local Business Enterprise (LBE) goal, 5% Local Small Business Enterprise (LSBE) goal, and a 3% Disabled Veterans Business Enterprise (DVBE) goal for this project. HOK+Arup has committed to 25% SBE, 7% LBE, 5% LSBE, 3% DVBE.
6. HOK+Arup will comply with the provisions of the Affirmative Action Program.
7. HOK+Arup has been assigned Business Tax Registration Certificate No. 0000775356-0001-8 and 0000086678-0001-4 respectively.
8. HOK+Arup will comply with the provisions of the Child Support Obligations Ordinance.
9. HOK+Arup must have approved insurance documents, in the terms and amounts required, on file with the Los Angeles World Airports prior to the issuance of a Notice to Proceed.
10. Pursuant to Charter Section 1022, staff determined the work specified on this contract can be performed more feasibly and economically by Independent Contractors than by City employees.
11. HOK+Arup has submitted the Contractor Responsibility Program Questionnaire and Pledge of Compliance and will comply with the provisions of the Contractor Responsibility Program.
12. HOK+Arup must be determined by Public Works, Office of Contract Compliance, to be in compliance with the provisions of the Equal Benefits Ordinance prior to execution of contract.
13. HOK+Arup will be required to comply with the provisions of the First Source Hiring Program for all non-trade LAX Airport jobs.
14. HOK+Arup has submitted the Bidder Contributions CEC Form 55 and Municipal Lobbying Ordinance CEC Form 50 and will comply with the provisions.
15. HOK+Arup has submitted the Iran Contracting Act of 2010 and will comply the with provisions.

# EXHIBIT

# 3

SHUTE MIHALY  
& WEINBERGER LLP

**ATTORNEY-CLIENT PRIVILEGE**

TO: El Segundo staff

FROM: Benjamin Gonzalez  
Osa L. Wolff

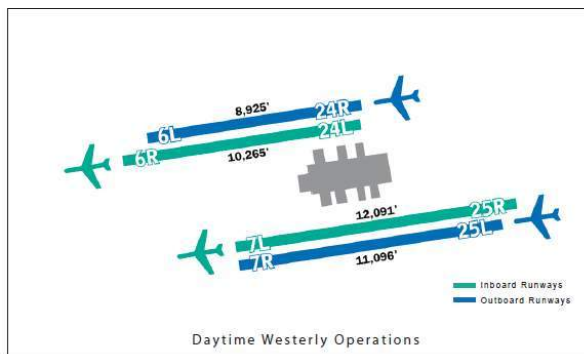
DATE: October 15, 2019

RE: Analysis of LAX Runway Usage Data for First and Second Quarter 2019

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Balance between the north and south runway complexes at LAX has historically been an important issue to El Segundo. El Segundo has wondered whether aircraft operations on the north and south runway complexes have been imbalanced in a manner that produces less noise for communities north of the north runway complex and more noise for El Segundo south of the south runway complex. As described in this memo, we recently looked to new data released by LAWA to shed light on this question.

The north complex at LAX consists of runways 06L, 06R, 24L, and 24R and the south complex consists of runways 07L, 07R, 25L, and 25R.



Communities north of the north runway complex are within the City of Los Angeles, which owns and operates LAX through LAWA. El Segundo and other communities around LAX, by contrast, have no elected representatives in the City of LA.

In its first and second quarterly noise reports for 2019, LAWA included, for the first time, data on LAX average daily runway use by aircraft type. This data was required by the terms of the 2011 variance issued by Caltrans. The data was presented as two

Memo to El Segundo  
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large tables, one for arrivals and one for departures (click [here](#) to access reports; tables begin on p. 17 of PDFs).

In order to analyze this data in terms of runway balance, we divided the aircraft into four categories: narrow-body, wide-body, regional, and general aviation.<sup>1</sup> We then determined the total operations (arrivals and departures) by runway complex for each aircraft category. Beginning with Q1, our findings show that overall (arrivals and departures) the north complex hosts approximately 874 daily operations, whereas the south complex hosts approximately 962 daily operations. Thus, about 88 more operations occur on the south runway complex each day (approximately 5% more). Larger disparities appear when analyzing the data on wide-body aircraft.<sup>2</sup>

Overall (arrivals and departures) there were approximately 29 more wide-body operations daily on the south complex than the north (approximately 10% more). Additionally, there were approximately 45 more wide-body departures (approximately 30% more) on the south complex daily.<sup>3</sup> The fact that wide-body aircraft tended to use the south complex more than the north, overall and for departures, is important because wide-body aircraft tend to be noisier than smaller aircraft and, for El Segundo, departures are noisier than arrivals.<sup>4</sup>

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<sup>1</sup> The general aviation category includes all smaller aircraft that can carry 50 people or fewer. Regional airplanes are those that can carry from 50-100 passengers and are generally named as “regional jets.” Narrow-body aircraft were distinguished from wide-body aircraft based on the dimensions of the chassis of the plane (wide-body aircraft typically have two aisles, whereas narrow-body aircraft generally only have one). Wide-body aircraft can typically hold more passengers as well. Some aircraft were not included in this analysis because their ICAO code did not readily appear on any online database and determining the aircraft category was not possible.

<sup>2</sup> The south complex hosted approximately 35 more narrow-body aircraft, 30 more wide-body aircraft, and 50 more general aviation aircraft on a daily basis compared to the north complex. Only regional aircraft used the north complex more often, with approximately 28 more regional aircraft operations occurring daily.

<sup>3</sup> Overall, wide-body aircraft used the north complex more for arrivals, with approximately 16 more operations daily on the north complex than the south (approximately 11% more).

<sup>4</sup> We ran the same type of analysis for the Second Quarter 2019 Quarterly Noise Report, which produced very similar results with only slightly more balance between the complexes. Overall (arrivals and departures), approximately four percent more aircraft used the south complex. Overall for wide-body aircraft, approximately 10 percent more used the south complex. For departures, approximately 25 percent more wide-body aircraft use the south complex.

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LAWA’s first and second quarterly 2019 noise reports also provided data on the average runway use for both the north and south runway complexes as an overall percentage of usage. The data is separated between arrivals and departures, and is further broken down by time of day. LAWA also provided a breakdown for the percentage of daily operations using each specific runway. This is a screenshot the 2019 Q1 Report (p. 15 of PDFs).



Runway Utilization Report  
 Summary of Runway Use (Average)  
 Los Angeles International Airport

Period : 01/01/2019 to 03/31/2019  
 Airline : ALL  
 Aircraft : ALL

| Time Period         | Percent Daily Operations Per Runway |     |     |     |     |     |     |     | Average Operations | Runway Complex |       | Runway Flow |      | In Board | Out Board |  |
|---------------------|-------------------------------------|-----|-----|-----|-----|-----|-----|-----|--------------------|----------------|-------|-------------|------|----------|-----------|--|
|                     | 06L                                 | 06R | 07L | 07R | 24L | 24R | 25L | 25R |                    | South          | North | West        | East |          |           |  |
| <b>Departures</b>   |                                     |     |     |     |     |     |     |     |                    |                |       |             |      |          |           |  |
| <b>Total Hours</b>  |                                     |     |     |     |     |     |     |     |                    |                |       |             |      |          |           |  |
| 24 Hours            | <1%                                 | 3%  | 5%  | <1% | 42% | <1% | 2%  | 47% | 920                | 55%            | 45%   | 92%         | 8%   | 98%      | 2%        |  |
| <b>CNEL Hours</b>   |                                     |     |     |     |     |     |     |     |                    |                |       |             |      |          |           |  |
| 0700 - 1900         | <1%                                 | 4%  | 5%  | <1% | 46% | <1% | 2%  | 43% | 619                | 50%            | 50%   | 92%         | 8%   | 98%      | 2%        |  |
| 1900 - 2200         | 0%                                  | 3%  | 4%  | <1% | 45% | <1% | 2%  | 46% | 123                | 52%            | 48%   | 94%         | 6%   | 97%      | 3%        |  |
| 2200 - 0700         | 0%                                  | 2%  | 7%  | <1% | 26% | <1% | 2%  | 62% | 178                | 71%            | 29%   | 91%         | 9%   | 97%      | 3%        |  |
| <b>Contra Hours</b> |                                     |     |     |     |     |     |     |     |                    |                |       |             |      |          |           |  |
| Midnight - 0630     | 0%                                  | 2%  | 8%  | <1% | 13% | <1% | 3%  | 74% | 86                 | 84%            | 16%   | 90%         | 10%  | 97%      | 3%        |  |
| 0630 - Midnight     | <1%                                 | 3%  | 5%  | <1% | 45% | <1% | 2%  | 45% | 834                | 51%            | 49%   | 92%         | 8%   | 98%      | 2%        |  |
| <b>Arrivals</b>     |                                     |     |     |     |     |     |     |     |                    |                |       |             |      |          |           |  |
| <b>Total Hours</b>  |                                     |     |     |     |     |     |     |     |                    |                |       |             |      |          |           |  |
| 24 Hours            | 4%                                  | 3%  | <1% | 4%  | <1% | 43% | 45% | 1%  | 917                | 50%            | 50%   | 89%         | 11%  | 5%       | 95%       |  |
| <b>CNEL Hours</b>   |                                     |     |     |     |     |     |     |     |                    |                |       |             |      |          |           |  |
| 0700 - 1900         | 4%                                  | <1% | <1% | 4%  | <1% | 45% | 45% | 1%  | 620                | 51%            | 49%   | 92%         | 8%   | 2%       | 98%       |  |
| 1900 - 2200         | 3%                                  | <1% | <1% | 3%  | <1% | 46% | 45% | 1%  | 161                | 50%            | 50%   | 93%         | 7%   | 2%       | 98%       |  |
| 2200 - 0700         | 4%                                  | 18% | <1% | 6%  | <1% | 28% | 40% | 2%  | 136                | 49%            | 51%   | 71%         | 29%  | 22%      | 78%       |  |
| <b>Contra Hours</b> |                                     |     |     |     |     |     |     |     |                    |                |       |             |      |          |           |  |
| Midnight - 0630     | 4%                                  | 48% | 1%  | 9%  | 2%  | 9%  | 23% | 4%  | 52                 | 38%            | 62%   | 38%         | 62%  | 54%      | 46%       |  |
| 0630 - Midnight     | 4%                                  | <1% | <1% | 4%  | <1% | 45% | 46% | 1%  | 865                | 51%            | 49%   | 92%         | 8%   | 2%       | 98%       |  |

All values are rounded to the nearest whole number.

Focusing on the Runway Complex south and north columns, we can see that averaged over a 24-hour period, LAX might be said to experience a slight imbalance between use of the north and south runway complexes. For departures, there is a 55/45 percent split between south and north. For arrivals, the split is 50/50. Looking further down those columns (see highlighted entries), the disparity is much larger:

71% of departures used the south complex during CNEL Hours 2200-0700; and 84% of departures used the south complex during Contra Hours Midnight-0630.<sup>5</sup>

<sup>5</sup> For Q2, 69% of departures used the south complex during CNEL Hours 2200-0700 and 79% of departures used the south complex during Contra Hours Midnight-0630.

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October 15, 2019  
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This is important for El Segundo because late night and early morning imbalance and noise is likely to be more problematic than imbalance and noise during the remainder of the day.<sup>6</sup>

LAWA also provided data on LAX's Average Daily Runway Use By Aircraft Type- Night-time (10pm-7am) (starting on p.21 of the reports). Analyzing this data for the Q1 2019 report, the imbalanced runway use during CNEL Hours 2200-0700 is brought to light. For departures, where the greatest imbalance is seen, there were approximately 178 operations during these hours. From those, approximately 127 used the south complex, as opposed to only 51 for the north complex. Particularly troublesome is that of the 59 wide-body daily departures during this time, approximately 44 used the south complex (only 15 used the north complex). This means that approximately 75% of departing wide-body aircraft during CNEL hours 2200-0700 used the south complex.<sup>7</sup>

As outlined above, our analysis of LAWA's recent data shows an imbalanced use of runways at LAX that may favor communities to the north of LAX over El Segundo. That imbalance may be occurring for multiple reasons. To the extent you are able to arrange a meeting with the FAA/Air Traffic Control, we would suggest bringing up this imbalance and requesting that the FAA/ATC implement procedures to better balance runway use, especially in the late night/early morning and by aircraft type.

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<sup>6</sup> It is important to note that more operations occur at LAX during the day than at night. For Q1, 178 operations occurred during CNEL Hours 2200-0700, out of a total of 920 operations (approximately 19% of total operations). Similarly, 86 operations occurred during Contra Hours Midnight-0630 (approximately 10% of total operations). Although the data shows a substantial north/south imbalance in late night operations, that imbalance is not apparent in the total hours data because the number of late-night operations is relatively small.

<sup>7</sup> Of the approximately 101 total narrow-body operations departing during CNEL hours 2200-0700, about 70 occurred on the south complex compared to only 31 on the north. This means that approximately 77% of departing narrow-body aircraft used the south complex compared to the north during this time.

# EXHIBIT

# 4

SHUTE, MIHALY  
& WEINBERGER LLP

December 23, 2019

**Via E-Mail and U.S. Mail**

Evelyn Quintanilla  
Chief of Airport Planning II  
Los Angeles World Airports  
P.O. Box 92216  
Los Angeles, CA 90009-2216  
E-Mail: [equintanilla@lawa.org](mailto:equintanilla@lawa.org)

Re: CEQA Analysis for Midfield Satellite Concourse and ATMP

Dear Ms. Quintanilla:

On behalf of El Segundo, we have carefully reviewed LAWA's existing environmental analysis for the Midfield Satellite Concourse – South Project (“MSC South”), the next proposed phase of the Midfield Satellite Concourse (“MSC”) Project, as well as the Notice of Preparation (“NOP”) for the LAX Airfield & Terminal Modernization Project (“ATMP”). On May 6, 2019, Shute, Mihaly & Weinberger submitted comments in response to LAWA's release of the ATMP NOP. This letter supplements the comments made in the May 6, 2019 letter and discusses additional information presented within LAWA's latest environmental document for MSC South, a memo from Ricondo & Associates (“Ricondo Memo”).<sup>1</sup> This letter should be added to the administrative record for both the ATMP and MSC South. Ultimately, we believe that the Ricondo Memo is legally insufficient in analyzing the environmental impacts of MSC South, particularly in conjunction with the now-foreseeable ATMP.

**A. LAWA Has Improperly Concluded MSC South May Proceed Without Further Formal Environmental Analysis.**

Further CEQA analysis would be needed before LAWA could proceed with approval/construction of MSC South. MSC South, as currently envisioned by LAWA, is

<sup>1</sup> We learned of the Ricondo Memo by monitoring LAWA's Board of Airport Commissioners (“BOAC”) agendas and then requested it from LAWA's staff. The memo does not appear to have been made publicly available through LAWA's website.



an entirely different project from that previously evaluated. For example, according to the BOAC August 1, 2019 Agenda staff report:

“The MSC South Project was originally envisioned to be an extension of the MSC North, with similar architecture, function, and scale. To build to this concept would require significant delivery time and investment, as well as necessitate the demolition of the American Airlines (AA) SuperBay Hangar, for which we have no adequate replacement in the near future. However, due to recent growth in passenger activity - as well as ongoing renovation efforts throughout LAX that requires the closure of other gates - there is an urgency to deliver more domestic gates in the near term. Moreover, *with the planned development of Terminal 9 and Concourse 0, there is no longer the same need to use MSC South as a fully functioning international terminal as was originally envisioned.*”

BOAC August 1, 2019 Agenda Staff Report for Item 15 at 3 (emphasis added).

Thus, the MSC South project LAWA now wants to construct differs substantially from what LAWA previously evaluated. Moreover, MSC South is now inextricably linked to the ATMP and its environmental impacts must be evaluated together with that project.

Furthermore, the 2014 Midfield Satellite Concourse Draft EIR (“2014 MSC DEIR”) contains (at least) two references to future environmental review, particularly that construction emissions will be discussed under a project-level environmental review at such time that LAWA determines the timing of any future phase(s) of the MSC and that impacts of future projects will be analyzed on a project-level review once “LAWA determines the timing of such improvements.” 2014 MSC DEIR at 2-51, 4-11, 4-19. LAWA must now follow through on its prior commitments to conduct project-level environmental review for MSC South.

We object to the Ricondo Memo because it is not the kind of document contemplated by the 2014 MSC DEIR and, as discussed in detail below, it inadequately analyzes the project-level impacts of MSC South (see Section C below). The 2014 MSC DEIR indicated that LAWA would prepare and publicly release a formal CEQA document once the timing of the MSC South project was determined. Instead, LAWA has commissioned the Ricondo Memo. The memo was not circulated to the public for review as LAWA’s CEQA documents normally are. And to our knowledge, it has not even been

posted by LAWA on its website. Rather, we discovered the existence of the memo only by examining BOAC agendas. Simply stated, the Ricondo Memo does not provide the kind of formal and transparent project-level environmental analysis contemplated in the 2014 MSC DEIR for the future phases of the MSC Project.

The Ricondo Memo argues that no further CEQA review need be done. Their conclusion, however, is incorrect. Not only has LAWA already clearly committed to conducting further project-level environmental review for MSC, but LAWA's plans for MSC now differ substantially from what was analyzed in the programmatic 2014 MSC DEIR. Further CEQA review is triggered by those proposed changes to MSC South.

Finally, the Ricondo Memo does not acknowledge or evaluate the full extent of operations that would occur at MSC South as recently re-envisioned by LAWA. There would, for example, apparently be a greater concentration of operations at the eight proposed MSC South gates. Additionally, the 2014 MSC DEIR did not mention or recognize the ATMP as a future foreseeable project within its cumulative impact analysis. *See* 2014 MSC DEIR at 4-56 (table showing cumulative construction projects peak daily emissions estimates); *see also id.* at 3-5 to 3-7 (table listing on-going and future projects at LAX). LAWA must analyze the impacts of MSC South in light of any foreseeable impacts and projects, particularly the ATMP. This is critically important because the ATMP would increase the capacity of LAX well beyond that envisioned under the 2004 LAX Master Plan.

**B. In the Context of the ATMP, LAWA Is Improperly Double Counting Removal of the WRGs, Which Must Already be Decommissioned as Part of the MSC Project.**

As stated in the ATMP NOP, LAWA is considering “replacing” nine West Remote Gates (“WRGs”), which it indicates will need to be removed for extension of Taxiway D. LAWA's ATMP proposal calls for that replacement to occur with new gates within Terminal 9 and/or Concourse 0. In the ATMP context, LAWA takes “credit” for removing WRGs, arguing that their removal will offset new gates proposed at Terminal 9 and Concourse 0. The problem with LAWA's logic here is that those are the same WRGs that LAWA already promised it would remove as part of the MSC project. This is improper double counting.

The 2014 MSC DEIR explicitly states that the WRGs will be decommissioned upon completion of the MSC project. Specifically, in Section 2.2 of the 2014 DEIR, LAWA quotes from the LAX Master Plan that the MSC “would replace the remote gate pads now located on the west pad facility . . . . (Final LAX Master Plan page 2-85).”

2014 MSC DEIR at 2-5. In Section 4.1.2.1 of the 2014 MSC DEIR, LAWA states that “[o]nce the future phase(s) of the MSC Program is completed, the West Remote Gates/Pads would be eliminated.” *Id.* at 4-16, fn.10. Additionally, in response to comments in the MSC Final EIR (“FEIR”), LAWA confirms that they “will decommission the West Remote Gates/Pads once the future phase(s) of the MSC Program is completed, consistent with the approved 2004 LAX Master Plan.” MSC FEIR at 2-20, 2-31.

LAWA’s ATMP NOP ignores LAWA’s prior commitment, as part of the MSC project, to remove the WRGs. As described in the ATMP NOP, LAWA proposes to add a total of 27 new gates. LAWA indicates the new ATMP gates will be replacing ten gates from the American Eagle Commuter Gates (removed to make way for Terminal 9, with those operations moved to MSC South) and 9 WRGs (removed to make way for the extension of Taxiway D). LAWA cannot, however, take credit for removal and replacement of nine WRGs as part of the ATMP, when those WRGs must already be decommissioned as a result of the MSC Project. LAWA appears to be double counting the WRGs to downplay the substantial increase in gates proposed at LAX. LAWA must instead fully acknowledge its proposal to increase the number of gates at LAX well beyond what was evaluated in the operative 2004 LAX Master Plan. LAWA’s CEQA analysis must also acknowledge that there is a substantial functional difference between remote gates (like the WRGs and the American Eagle Commuter Gates) and contact gates like those proposed for MSC South, Terminal 9 and Concourse 0. Because remote gates require bussing, they are far less efficient and support fewer operations.

Since the 2014 MSC EIR and LAX Master Plan commit LAWA to eliminating the WRGs upon completion of the MSC project, LAWA cannot also rely on removal of the WRGs to offset any potential gate increases from the ATMP. LAWA must instead evaluate the full environmental impacts of the 27 gates that will be added as part of the ATMP.

**C. LAWA’s Environmental Analysis Improperly Ignores the Connection Between the ATMP and MSC Project.**

Although LAWA readily acknowledges that MSC South and the ATMP are coordinated and interdependent projects, its environmental analysis does not reflect that reality. LAWA’s current plan for MSC South calls for the eight new MSC South gates to serve as “empty chairs” during other airport modernization efforts (i.e., the ATMP). As such, CEQA mandates that the two projects must be evaluated in a unified and coordinated fashion, but LAWA does not appear to be taking that approach.

The Ricondo Memo fails to comply with CEQA because it fails to acknowledge that the ATMP is part of the MSC South project (or vice-versa), and therefore fails to disclose the environmental impacts of the “whole of [the] action.” *See* Guidelines § 15378(a). LAWA has improperly piecemealed MSC South from the ATMP, despite acknowledging that due to “the planned development of Terminal 9 and Concourse 0, there is no longer the same need to use MSC South as a fully functioning international terminal as was originally envisioned.” *See* BOAC August 1, 2019 Agenda Staff Report for Item 15 at 3. This clearly illustrates that MSC South and the ATMP are “part of a single, coordinated endeavor.” *Assn. for a Cleaner Environment v. Yosemite Community College Dist.* (2004) 116 Cal.App.4th 629, 639.

CEQA prohibits “segmentation” of a project—the “chopping up [of] proposed projects into bite-size pieces which, when taken individually, may have no significant adverse effect on the environment.” *Tuolumne County Citizens for Responsible Growth, Inc. v. City of Sonora* (2007) 155 Cal.App.4th 1214, 1223-24 (“*Tuolumne*”) (quoting *Plan for Arcadia, Inc. v. City Council of Arcadia* (1974) 42 Cal.App.3d 712, 726); *see also Tuolumne*, 155 Cal.App.4th at 1229 (“when one activity is an integral part of another activity, the combined activities are within the scope of the same CEQA project” and must be analyzed together). CEQA instructs that “[w]here an individual project is a necessary precedent for action on a larger project . . . an EIR must address itself to the scope of the larger project.” Guidelines § 15165. LAWA mentions that the MSC Project will function as an “empty chair” during ongoing renovation efforts throughout LAX that will require closure of other gates. Thus, the MSC is essentially an enabling project for the ATMP, such that MSC South is a foreseeable consequence of the ATMP’s displacement of the American Eagle commuter gates, which LAWA has stated will be relocated to MSC South. Additionally, LAWA recently redesigned MSC South to serve more domestic flights partly due to the ATMP handling more international operations.

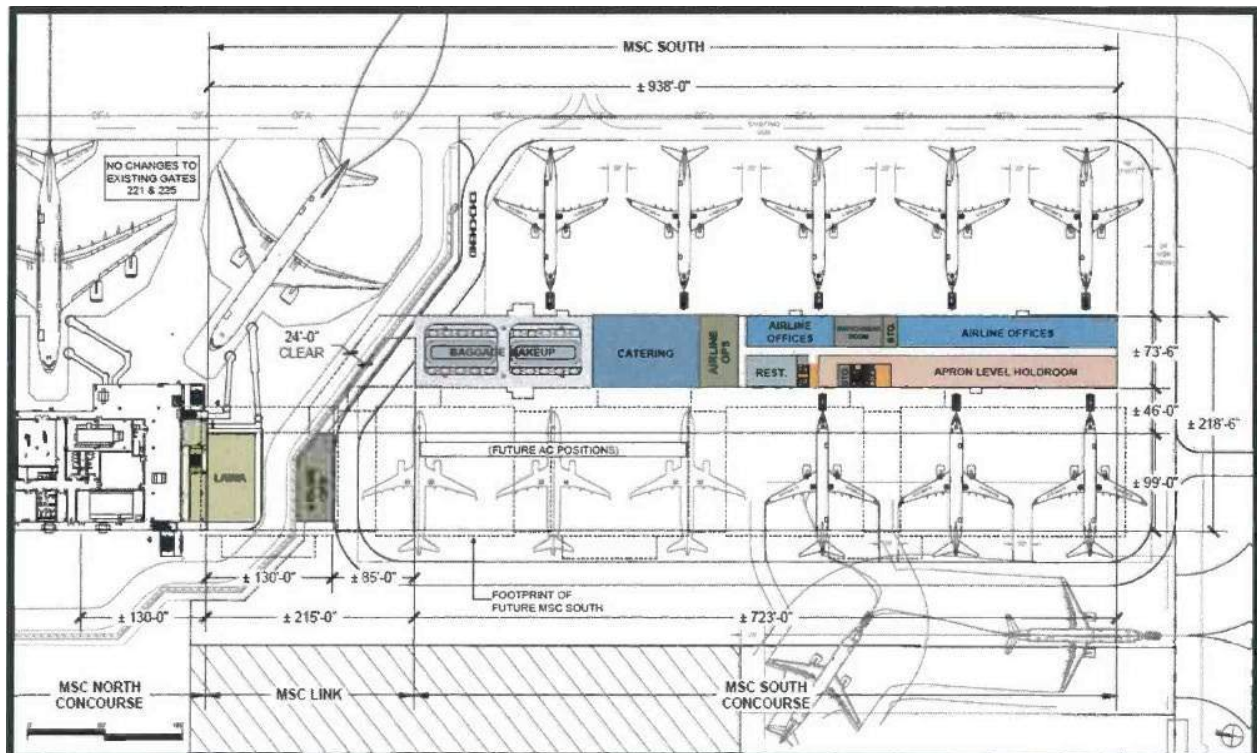
Even if MSC South and the ATMP are not evaluated as a single project, MSC South must be analyzed in light of the increase in passenger operations associated with the ATMP, which includes a combination of runway and terminal expansions. Thus, the ATMP will change operations airport-wide, including at MSC South. LAWA must study MSC South’s environmental impacts within this new context.

The ATMP proposal also includes new information which was not known and could not have been known at the time the 2014 MSC EIR was certified. That new information indicates that the significant MSC effects previously examined will be substantially more severe than previously acknowledged. Public Resources Code § 21166(c); CEQA Guidelines, Cal. Code Regs., tit. 14 (“Guidelines”), § 15162(a)(3)(B). Moreover, the ATMP proposal represents a substantial change with respect to the

circumstances under which the MSC South project would be undertaken, which triggers revisions to the analysis in the 2014 MSC EIR due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects. Public Resources Code § 21166(b); Guidelines § 15162(a)(2).

**D. The Ricondo Memo Fails to Analyze LAWA’s Plans for the Future Expansion of MSC South.**

The Ricondo Memo also fails to analyze foreseeable future expansion of MSC South. As illustrated in the diagram below, LAWA envisions that there will be 3 additional “Future AC Positions” on the west side of MSC South. *See* BOAC August 1, 2019 Agenda Staff Report for Item 15 at 5. These future positions are likely to be new gates that will be opened once the American Airlines SuperBay Hangar is demolished and replaced (as contemplated by the 2014 MSC DEIR). LAWA has stated that there is no adequate replacement for the hangar in the near future, but demolition of the hangar and installation of additional gates is clearly part of LAWA’s eventual plan for MSC South. To comply with CEQA, LAWA must analyze the entirety of its plan for MSC South.

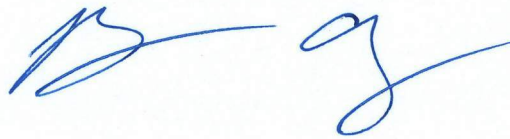


Evelyn Quintanilla  
December 23, 2019  
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Thank you for your attention to these issues and we look forward to working through this with LAWA.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP



Benjamin Gonzalez

1187424.3

# EXHIBIT

# 5

 Los Angeles World Airports  
**REPORT TO THE**

Item Number  
**15**

**BOARD OF AIRPORT COMMISSIONERS**

| <p><br/>Approved by: Greg S. Campbell, Chief Airports Engineer II</p> |           | <p><u>Meeting Date:</u><br/><br/>8/1/2019</p>   |    |              |      |                 |    |         |           |  |    |      |           |  |    |             |           |  |    |                  |           |  |    |                    |           |  |    |
|--|-----------|---|----|--------------|------|-----------------|----|---------|-----------|--|----|------|-----------|--|----|-------------|-----------|--|----|------------------|-----------|--|----|--------------------|-----------|--|----|
| <p><br/>Reviewed by: Robert L. Gilbert, Chief Development Officer</p> |           | <p><u>CAO Review:</u></p> <p><input type="checkbox"/> Completed<br/><input type="checkbox"/> Pending<br/><input checked="" type="checkbox"/> N/A</p>  |    |              |      |                 |    |         |           |  |    |      |           |  |    |             |           |  |    |                  |           |  |    |                    |           |  |    |
| <p><br/>City Attorney</p>   |           | <p><i>ALL</i></p>   |    |              |      |                 |    |         |           |  |    |      |           |  |    |             |           |  |    |                  |           |  |    |                    |           |  |    |
| <p><br/>For Deborah Flint, Chief Executive Officer</p>                |           | <table border="1"> <thead> <tr> <th>Reviewed for</th> <th>Date</th> <th>Approval Status</th> <th>By</th> </tr> </thead> <tbody> <tr> <td>Finance</td> <td>7/23/2019</td> <td><input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA</td> <td>RW</td> </tr> <tr> <td>CEQA</td> <td>7/11/2019</td> <td><input checked="" type="checkbox"/> Y <input type="checkbox"/> N</td> <td>PI</td> </tr> <tr> <td>Procurement</td> <td>7/17/2019</td> <td><input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Cond</td> <td>MJ</td> </tr> <tr> <td>Guest Experience</td> <td>7/17/2019</td> <td><input checked="" type="checkbox"/> Y <input type="checkbox"/> N</td> <td>BY</td> </tr> <tr> <td>Strategic Planning</td> <td>7/23/2019</td> <td><input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA</td> <td>KV</td> </tr> </tbody> </table> |    | Reviewed for | Date | Approval Status | By | Finance | 7/23/2019 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA | RW | CEQA | 7/11/2019 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | PI | Procurement | 7/17/2019 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Cond | MJ | Guest Experience | 7/17/2019 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N | BY | Strategic Planning | 7/23/2019 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA | KV |
| Reviewed for   | Date      | Approval Status   | By |              |      |                 |    |         |           |  |    |      |           |  |    |             |           |  |    |                  |           |  |    |                    |           |  |    |
| Finance  | 7/23/2019 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA  | RW |              |      |                 |    |         |           |  |    |      |           |  |    |             |           |  |    |                  |           |  |    |                    |           |  |    |
| CEQA   | 7/11/2019 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N  | PI |              |      |                 |    |         |           |  |    |      |           |  |    |             |           |  |    |                  |           |  |    |                    |           |  |    |
| Procurement  | 7/17/2019 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> Cond  | MJ |              |      |                 |    |         |           |  |    |      |           |  |    |             |           |  |    |                  |           |  |    |                    |           |  |    |
| Guest Experience   | 7/17/2019 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N  | BY |              |      |                 |    |         |           |  |    |      |           |  |    |             |           |  |    |                  |           |  |    |                    |           |  |    |
| Strategic Planning   | 7/23/2019 | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA  | KV |              |      |                 |    |         |           |  |    |      |           |  |    |             |           |  |    |                  |           |  |    |                    |           |  |    |

**SUBJECT: Approve Change Order No. 241 to Contract No. DA-4971 with Turner PCL, A Joint Venture, for the Midfield Satellite Concourse project.**

Approve Change Order No. 241 to Contract No. DA-4971 in the amount of \$4,200,075, and an additional \$700,000 for the procurement and installation of Transportation Security Administration screening equipment. Change Order No. 241 authorizes the construction of modifications for Transportation Security Administration Security Screening Check Point operations for in-transit passengers at the Midfield Satellite Concourse.

**RECOMMENDATIONS:**

Management RECOMMENDS that the Board of Airport Commissioners:

1. ADOPT the Staff Report.
2. DETERMINE that this action is exempt from the California Environmental Quality Act (CEQA) pursuant to Article II, Section 2.i of the Los Angeles City CEQA Guidelines.
3. APPROVE Change Order No. 241, for Contract No. DA-4971, in the not to exceed amount of \$4,200,075.
4. FURTHER APPROVE \$700,000 for the procurement and installation of Transportation Security Administration screening equipment.



5. APPROPRIATE capital funds in the amount of \$4,900,075 which includes construction costs.
6. AUTHORIZE the Chief Executive Officer to execute Change Order No. 241 with Turner PCL, a Joint Venture, upon approval as to form by the City Attorney.

## **DISCUSSION:**

### **1. Purpose**

This change order authorizes modifying the south basement level of the Midfield Satellite Concourse (MSC) to incorporate Transportation Security Administration (TSA) Security Screening Check Point (SSCP) operations with United States Customs and Border Patrol (CBP) primary operations for in-transit passengers on opening day.

### **2. Prior Related Actions**

- **December 18, 2014 – Resolution No. 25595 (DA-4971)**  
The Board of Airport Commissioners (Board) awarded a Two-Phase Design-Build Contract to TPJV for MSC North project at Los Angeles International Airport (LAX), for the cost of \$961,270,169; and appropriation of \$174,889,794.
- **February 18, 2016 – Resolution No. 25898 (DA-4971)**  
The Board approved an Administrative Change Order to Contract with TPJV to reallocate design funds of \$27,481,340 covering the MSC North project at LAX; and include certain administrative changes.
- **August 18, 2016 – Resolution No. 26059 (DA-4971)**  
The Board approved an additional appropriation of capital funds in the amount of \$59,077,469 for CGMP Early Work Package Scope Elements of the MSC North project at LAX.
- **November 17, 2016 – Resolution No. 26112 (DA-4971)**  
The Board approved a Guaranteed Maximum Price Change Order No. 6 in the amount of \$355,337,070 and the appropriation of capital funds in the total amount of \$1,317,235,766 to TPJV for the Design and Construction costs of the MSC North.
- **February 21, 2019 - Resolution No. 26709 (DA-4971)**  
The Board approved Change Order No. 164 to grant an excusable time extension of 70 calendar days and impacts costs resulting from contaminated soils encountered at the MSC Passenger (PAX) West Tunnel.
- **July 18, 2019 – Resolution No. 26816 (DA-4971)**  
The Board approved Change Order No. 229 to Contract No. DA-4971 to grant an excusable, compensable 53 calendar-day time extension; excusable, non-compensable five calendar-day time extension; and impact costs not to exceed \$24,441,561, as a result of unforeseen utilities, differing site conditions, and contaminated soils impacts at the Midfield Satellite Concourse, East Passenger Tunnel.

- **July 18, 2019 – Resolution No. 26817 (DA-4971)**

The Board approved Change Order No. 230 to Contract No. DA-4971 in the not to exceed amount of \$32,648,983, to incorporate three additional Group III aircraft gates to the Midfield Satellite Concourse North, and appropriated funds in the same amount.

### 3. Current Action

When the MSC GMP was established in late 2016, the program included the design and construction of the MSC basement as CBP overflow space to supplement TBIT primary operations. In 2018, as a result of further conversations with Airport Operations and airlines, staff identified that the incorporation of In-Transit Operations at the MSC would significantly benefit the guest experience.

Currently Los Angeles World Airports (LAWA) has three in-transit flights at Tom Bradley International Terminal (TBIT). To accommodate growth of in-transit operations and improve guest experience at the MSC, TSA screening operations and CBP primary inspection will be incorporated into the operations at the MSC with this change order. This will provide passengers and LAWA the benefit of in-transit services without having to traverse to TBIT for processing and then return to the MSC. This program change necessitated the reconfiguration of the CBP processing space and introduced TSA Security Screening Operations in the space adjacent to the CBP basement operations.

Staff negotiated the proposed Change Order in the value of \$4,200,075 to provide specific design and construction modifications, which include:

- TSA Passenger Queuing Space
- Two TSA Baggage Check Lanes with Baggage X-ray Machines
- One TSA Advanced Imaging Technology (AIT) Body Scan
- Two TSA Walk-thru Metal Detectors
- One TSA Private Screening Room
- One TSA Supervisor Podium
- TSA Information Technology (IT) and Storage Room
- Joint breakroom for TSA and CBP
- One CBP Operational Office

In addition to the change order, a budget of \$700,000 for the procurement and installation of TSA screening equipment is requested. Specific screening equipment includes:

- Baggage Screening X-Ray machines
- Walk Through Metal Detector
- Body Imaging Scanner
- Alternate Viewing Stations, with Bottle Liquid Scanner & Explosive Trace Detection
- Hard Barriers, Stanchions, Podiums

#### ***How this action advances a specific strategic plan goal and objective***

- This action advances this strategic goal and objective: *Deliver Facilities & Guest Experiences that are Exceptional: Develop, maintain and operate first class facilities.* Approving this Change Order allows the MSC project team to address the in-transit needs of the airline community. Other benefits includes improving the overall

screening operations at MSC/TBIT, and improving the guest experience for MSC passengers.

**Action Requested**

Staff requests the Board approve Change Order No. 241 to Contract No. DA-4971 with TPJV in the total amount of \$4,200,075 to complete the design and construction modifications at the MSC.

**Fiscal Impact**

The MSC is an approved capital project. Costs incurred under this contract will be capitalized and when projects are put in service, those costs will be recovered through terminal rates and charges, as well as through non-aeronautical revenues.

The breakdown of costs related Change Order No. 241 are as follows:

|                                   |           |                  |
|-----------------------------------|-----------|------------------|
| Sub-Contractor Cost of Work       | \$        | 3,254,468        |
| Design and Contractor Overhead    | \$        | 467,622          |
| Contractor Contingency            | \$        | 130,179          |
| Markups (Insurance/Fee/Subguard)  | \$        | 347,806          |
| <b>Change Order No. 241 Total</b> | <b>\$</b> | <b>4,200,075</b> |

In addition, because the introduction of TSA Security Screening Operations was not anticipated at GMP, staff is requesting that the project budget be increased and an appropriation be provided for the cost of the change order and the TSA Screening Equipment.

| MSC Appropriation Request            |           |                  |
|--------------------------------------|-----------|------------------|
| Change Order No. 241 Total           | \$        | 4,200,075        |
| TSA Screening Equipment              | \$        | 700,000          |
| <b>Total Requested Appropriation</b> | <b>\$</b> | <b>4,900,075</b> |

The budgeted MSC Owner Contingency is unchanged as this additional scope is requested to be funded with new money. The total contract value is revised as shown:

| MSC Contract Value Summary                    |           |                      |
|---|-----------|----------------------|
| Current Revised Contract Value                | \$        | 1,410,058,886        |
| Proposed Change Order No. 241                 |           | 4,200,075            |
| <b>Revised Contract Value Payable to TPJV</b> | <b>\$</b> | <b>1,414,258,961</b> |

**4. Alternatives Considered**

- **Take No Action**

If no action is taken, the Design-Build team will continue with only providing CBP primary inspection operation area in the basement level of MSC. Any in-transit flight gated at MSC will force in-transit passengers to be re-screened by TSA at TBIT SSCP and return

back to the MSC through the tunnel. Staff's preferred option is to make the modifications before the completion of construction.

- ***Make the Modifications at a later date***

To make the above mentioned modifications later is possible, but there would be a significant impact to operations at additional cost. This action would require long term disruptions in passenger experience and utility shutdowns, thus resulting in significant operational impacts.

### **APPROPRIATIONS:**

Staff requests that funds in the amount of \$4,200,075 be appropriated and allocated from the LAX Revenue Fund to WBS Element 1.12.19A-700 (MSC) and other Board approved WBS elements as may be required.

Staff further requests that a budget of \$700,000 be withdrawn from the LAWA Owner Contingency previously approved and appropriated under Change Order No. 6 to Contract No. DA-4971 with Turner | PCL, A Joint Venture, and allocated in the not-to-exceed amount of \$700,000 to WBS Element 1.12.19A-700 (MSC) as may be required.

### **STANDARD PROVISIONS:**

1. Any activity (approval of bids, execution of contracts, allocation of funds, etc.) for which the underlying project has previously been evaluated for environmental significance and processed according to the requirements of the California Environmental Quality Act (CEQA) is exempt from further review pursuant to Article II, Section 2.i of the Los Angeles City CEQA Guidelines. The Midfield Satellite Concourse Environmental Impact Report (EIR) was certified by the Board of Airport Commissioners for this project on July 21, 2014 (Resolution No. 25478).
2. The underlying contract was approved as to form by the City Attorney.
3. Actions taken on this item by the Board of Airport Commissioners will become final pursuant to the provisions of Los Angeles City Charter Section 245.
4. As this is a construction project, Turner | PCL, a Joint Venture will comply with the applicable provisions of the Living Wage Ordinance and the Labor Code of the State of California (Prevailing Wage).
5. Procurement Services Division reviewed this action (File No. 10038219) and established a mandatory 15% Small Business Enterprise goal for the Design Phase and a 15% Small Business Enterprise goal for the Construction Phase of the project. Turner | PCL, a Joint Venture has committed to 15% SBE participation separately for both phases and has achieved 19.76% to date.
6. Turner | PCL, a Joint Venture is required by contract to comply with the provisions of the Affirmative Action Program.
7. Turner | PCL, a Joint Venture has been assigned Business Tax Registration Certificate Number 0002801775-0001-4.

8. Turner I PCL, a Joint Venture is required by contract to comply with the provisions of the Child Support Obligations Ordinance.
9. Turner I PCL, a Joint Venture has approved insurance documents, in the terms and amounts required, on file with Los Angeles World Airports.
10. Pursuant to Charter Section 1022, staff determined the work specified on the proposed contract can be performed more feasibly or economically by an Independent Contractor than by City employees.
11. Turner I PCL, a Joint Venture has submitted the Contractor Responsibility Program Pledge of Compliance and will comply with the provisions of the Contractor Responsibility Program.
12. Turner I PCL, a Joint Venture has been determined by Public Works, Office of Contract Compliance to be in compliance with the provisions of the Equal Benefits Ordinance.
13. Turner I PCL, a Joint Venture will be required to comply with the provisions of the First Source Hiring Program for all non-trade Airport jobs.
14. Turner I PCL, a Joint Venture has submitted the Bidder Contributions CEC Form 55 and will comply with its provisions.
15. This action is not subject to the provisions of the Iran Contracting Act.

# EXHIBIT

# 6



July 2019 |

Los Angeles International Airport

# Environmental Analysis

## Phase 2 of the Midfield Satellite Concourse Program

Prepared for:

Los Angeles World Airports

Prepared by:

**RICONDO**

In association with:

Connico, Inc.

Ricondo & Associates, Inc. (Ricondo) prepared this document for the stated purposes as expressly set forth herein and for the sole use of Los Angeles World Airports and its intended recipients. The techniques and methodologies used in preparing this document are consistent with industry practices at the time of preparation and this Report should be read in its entirety for an understanding of the analysis, assumptions, and opinions presented. Ricondo & Associates, Inc. is not registered as a municipal advisor under Section 15B of the Securities Exchange Act of 1934 and does not provide financial advisory services within the meaning of such act.

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# 1. INTRODUCTION

The Los Angeles World Airports (LAWA) Board of Airport Commissioners (BOAC) has initiated a new multi-level concourse at Los Angeles International Airport (LAX) west of Tom Bradley International Terminal (TBIT). Development of this new multi-level concourse is called the Midfield Satellite Concourse (MSC) Program. Due to the size and scale of the MSC Program and immediate need to enable rehabilitation and modernization of existing facilities, LAWA is implementing the program in phases. On July 21, 2014, the BOAC certified a Final Environmental Impact Report (EIR) pursuant to the California Environmental Quality Act (CEQA) for all phases of the MSC Program. Phase 1 of the MSC Program is the construction of the northern portion of the multi-story MSC facility and associated improvements, referred to as the MSC North Project. The MSC EIR contained a project-level analysis of the MSC North Project, and a program-level analysis of the full MSC Program, including the planned southerly extension of the MSC building.<sup>1</sup>

LAWA is now proposing to construct and operate Phase 2 of the MSC Program to provide additional gates. Phase 2 of the MSC Program is needed to enable LAWA to maintain passenger level-of-service while LAX continues to undergo modernization that includes terminal renovations, passenger boarding bridge replacements, and taxiway and apron pavement rehabilitation. The MSC Program EIR envisioned up to an additional 18 gates for ADG III to ADG VI aircraft as part of the southerly extension of the MSC North building; the proposed Phase 2 of the MSC Program would provide up to 8 new gates for ADG III aircraft. Although the future phase(s) of the MSC Program was analyzed at a programmatic level in the MSC EIR, this document evaluates Phase 2 of the MSC Program at a project level of detail to determine if it has any effects that were not examined in the MSC EIR to determine whether an additional CEQA document must be prepared.

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<sup>1</sup> On March 19, 2015, BOAC considered an Addendum to the EIR, which addressed the relocation of LAX's existing Remote Transmitter/Receiver (RTR) facility. BOAC considered a second Addendum to the EIR on November 17, 2016, which addressed an extension of the MSC North concourse to the north; the addition of a 'Gateway' Facility; passenger and utility/baggage tunnels; and the relocation of a Los Angeles Department of Water and Power remote substation. A third addendum was prepared in October 2018, which addressed the conversion of four Aircraft Design Group (ADG) V gates in the MSC North concourse to dual-use gates that could each accommodate either one ADG V/VI aircraft or two ADG III aircraft. All of these project elements are included in Phase 1 of the MSC Program.

## 2. PREVIOUSLY APPROVED PROGRAM

### 2.1 LAX MASTER PLAN

The Los Angeles International Airport (LAX) Master Plan<sup>2</sup>, approved by the City of Los Angeles City Council in December 2004, is the strategic framework for future development at LAX. The main components of the LAX Master Plan include the modernization of the runway and taxiway system, redevelopment of the terminal area, access improvements to LAX, and enhancement of passenger safety, security, and convenience. The LAX Master Plan was the subject of a joint Environmental Impact Statement (EIS) and EIR completed in January 2005.<sup>3</sup> The City of Los Angeles City Council certified the Final EIR as complying with CEQA and the Federal Aviation Administration (FAA) issued a Record of Decision on the Final EIS in compliance with the National Environmental Policy Act (NEPA).

The approved LAX Master Plan includes the development of the “West Satellite Concourse”, which subsequent to the release of the Final EIR/EIS, was renamed the Midfield Satellite Concourse (MSC). The overall MSC Program, as documented in the LAX Master Plan, includes the following facilities:

- A Midfield Satellite Concourse (MSC) west of the Tom Bradley International Terminal (TBIT);
- A Central Terminal Processor (CTP) in the Central Terminal Area (CTA);
- A connector/conveyance system between the MSC and the CTP; and
- Construction of new taxiways/taxilanes, apron areas, and utilities to service the MSC.

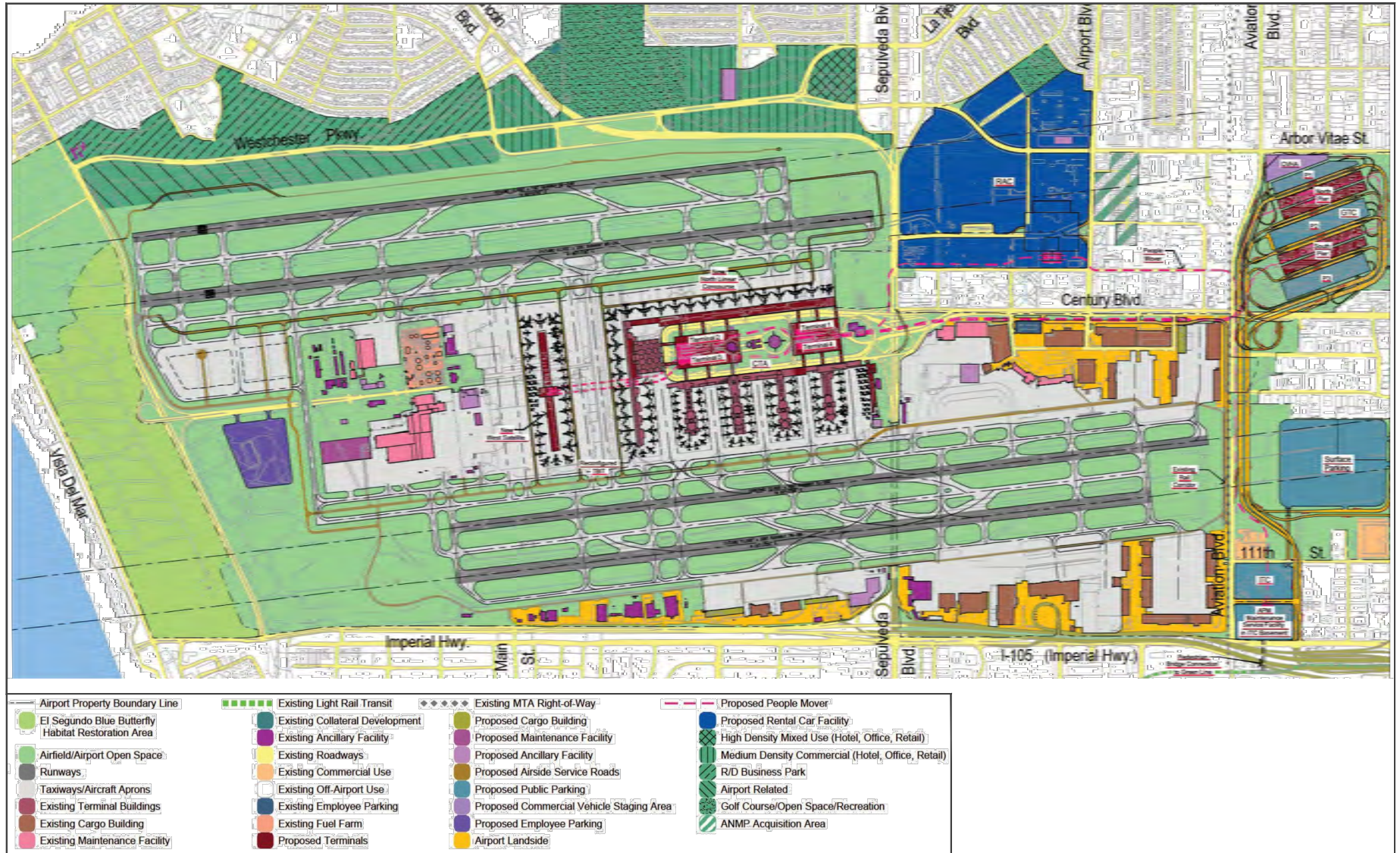
The main elements of the MSC Program, as described above, are identified on the airfield plan associated with the approved LAX Master Plan, Alternative D. **Figure 1** delineates the main components of the approved LAX Master Plan and shows a new concourse where one does not currently exist, labeled “New West Satellite,” and two crossfield taxiways immediately to the west side of this concourse. The MSC, referred to as the “West Satellite Concourse” in the LAX Master Plan and related EIS/EIR, are also noted in Sections 2.4 and 3.2.9 of the LAX Master Plan Final EIS/EIR and Sections 2.4 and 2.10 of the Final LAX Master Plan text, as presented below:

- Construct a new multi-level West Satellite Concourse west of the TBIT building in the area [formerly] occupied by the TWA, US Airways, and American Airlines aircraft maintenance hangars (Final LAX Master Plan page 2-123).
- A new 120-foot-wide by 1,900-foot-long West Satellite Concourse would be constructed west of the TBIT and would be accessed via an airside secure underground Automated People Mover (APM) from the CTA (LAX Master Plan Final EIR page 3-75)
- A new linear West Satellite Concourse would be constructed west of the TBIT and be accessed via an airside secure underground APM from the reconfigured CTA. The concourse would accommodate approximately 41 aircraft gates (Final LAX Master Plan page 2-85).

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<sup>2</sup> City of Los Angeles, Los Angeles World Airports, *Taking Flight for a Better Future, Los Angeles International Airport Final Master Plan*, April 2004.

<sup>3</sup> City of Los Angeles, Los Angeles World Airports *Final Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements*, April 2004; U.S. Department of Transportation, Federal Aviation Administration, *Environmental Impact Statement, Los Angeles International Airport Proposed Master Plan Improvements*, January 2005.



SOURCE: City of Los Angeles, Los Angeles World Airports Final Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements, April 2004; U.S. Department of Transportation, Federal Aviation Administration, Environmental Impact Statement, Los Angeles International Airport Proposed Master Plan Improvements, January 2005.

**FIGURE 1**



LAX MASTER PLAN ALTERNATIVE D

Drawing: P:\Project-Chicago\LA\WALAX MSC South\06 - Environmental\04 - AutoCAD\MSC SOUTH-Project Description Exhibits\_20190719.dwg Layout: Fig 1 Plotted: Jul 19, 2019, 01:56PM

- Construct, light, and mark new midfield crossfield taxiways west of the new West Satellite Concourse. Build aircraft parking apron associated with satellite concourse. Relocated Taxiways Q and S that are located immediately to the west of the TBIT building (Final LAX Master Plan page 2-123).
- Construct an underground tunnel for Airside APM and baggage systems from the future West Satellite Concourse to the redeveloped CTA. Construction would be phased to coincide with apron and taxiway reconstruction (Final LAX Master Plan page 2-123).

The Los Angeles City Council certified the LAX Master Plan EIR and approved the LAX Master Plan on December 7, 2004. Under NEPA, the FAA issued a Record of Decision (ROD) on the LAX Master Plan EIS that included environmental approval of the construction and operation of the full MSC Program as depicted on the ALP.

## 2.2 MIDFIELD SATELLITE CONCOURSE EIR

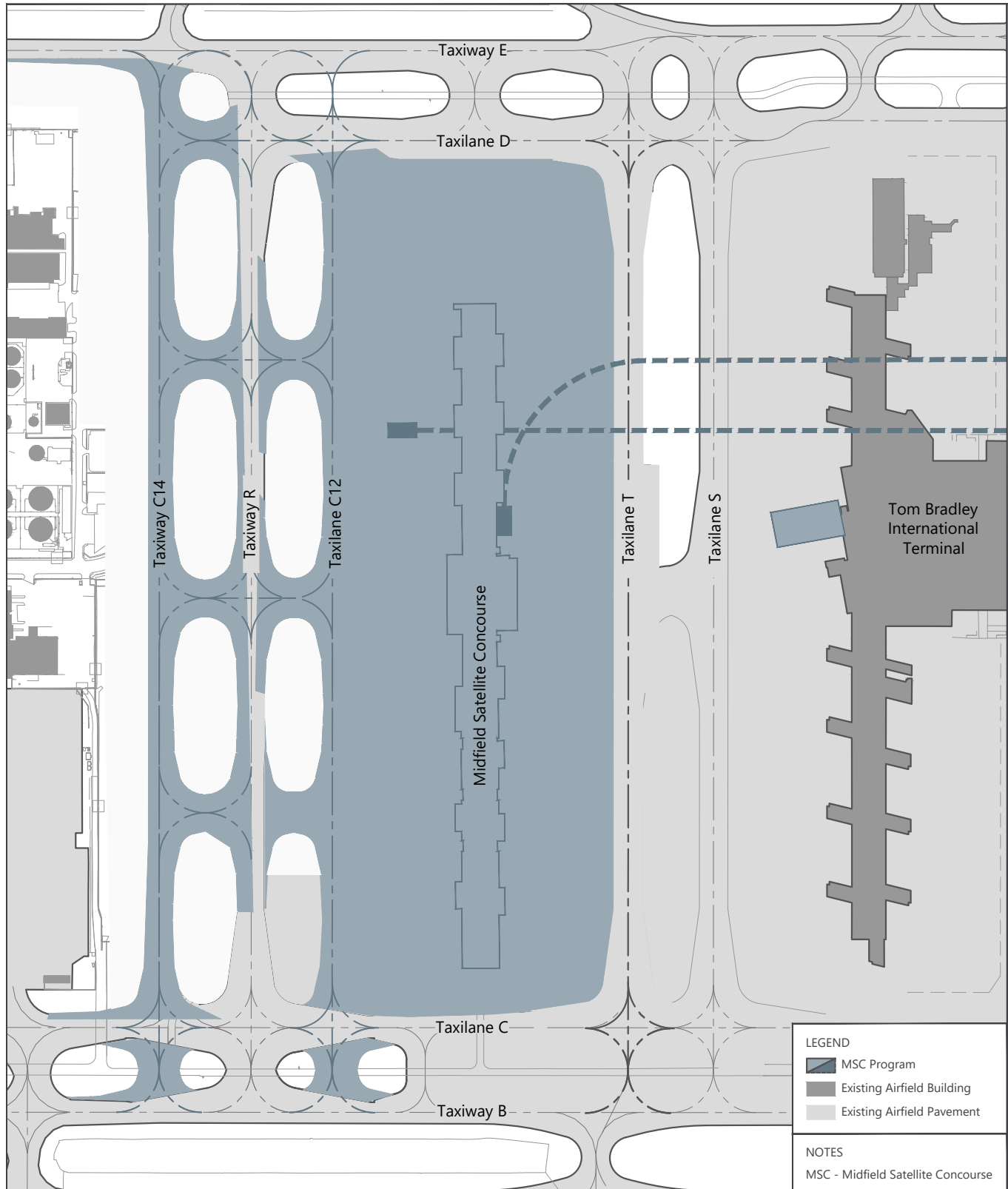
Subsequent to the certification of the LAX Master Plan Final EIS/EIR, the MSC Program was further refined. The MSC EIR<sup>4</sup> consisted of a project-level environmental review of the MSC North Project and a programmatic-level environmental review of the future phase(s) of the MSC Program. More specifically, the MSC EIR focused on significant environmental effects of the MSC North Project that may not have been fully addressed in the LAX Master Plan Final EIS /EIR, as well as any updates to the MSC Program from that assessed in the LAX Master Plan Final EIS/EIR. The MSC Program, as analyzed in the MSC EIR certified by the BOAC in July 2014, consisted of a new multi-level concourse with conveyance systems connecting the MSC and the CTA as well as a new taxilane, taxiways, apron, and utilities required to serve the MSC. Components of the MSC Program as discussed in the MSC EIR and subsequent addenda are shown on **Figure 2**. Due to the size and scale of the MSC Program and immediate need to enable rehabilitation and modernization of existing facilities, LAWA is implementing the program in phases. Phase 1 of the MSC Program is referred to as the MSC North Project. The MSC North Project is currently under construction and includes the following components, as shown on **Figure 3**:

- MSC North concourse and apron. The MSC North concourse would have a footprint of approximately 258,000 square feet, with estimated dimensions of 1,648 feet in length (north-south) and 125 to 250 feet in width (east-west).<sup>5</sup> The floor space of the MSC North concourse would consist of three to five levels and provide approximately 800,000 square feet for facilities such as passenger holdrooms, concessions, restrooms, airline lounges, utility rooms, and circulation. The MSC North concourse would have the ability to serve both international and domestic flights and provide 12 to 16 aircraft gates capable of accommodating ADG V and ADG VI aircraft down to ADG III aircraft. Four of the 12 gates at MSC North are dual-purpose gates that could each accommodate either one ADG V/VI aircraft or two ADG III aircraft, thus allowing up to 16 gates. The MSC North apron would extend from Taxiway D to the north, Taxilane C12 to the west, Taxilane T to the east, and a point just south of World Way West to the south.
- Construction of additional taxiways and taxilanes.
- Construction of approximately 2,900 linear feet of underground tunneling for baggage conveyance, utilities, and passengers from the MSC North concourse to the TBIT.

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<sup>4</sup> Los Angeles World Airports, *Final Environmental Impact Report, Midfield Satellite Concourse*, June 2014.

<sup>5</sup> Gatehouses are 24 feet, making the concourse 168 feet wide in some areas. Additionally, the 'Core' of the MSC would have a width of approximately 250 feet.

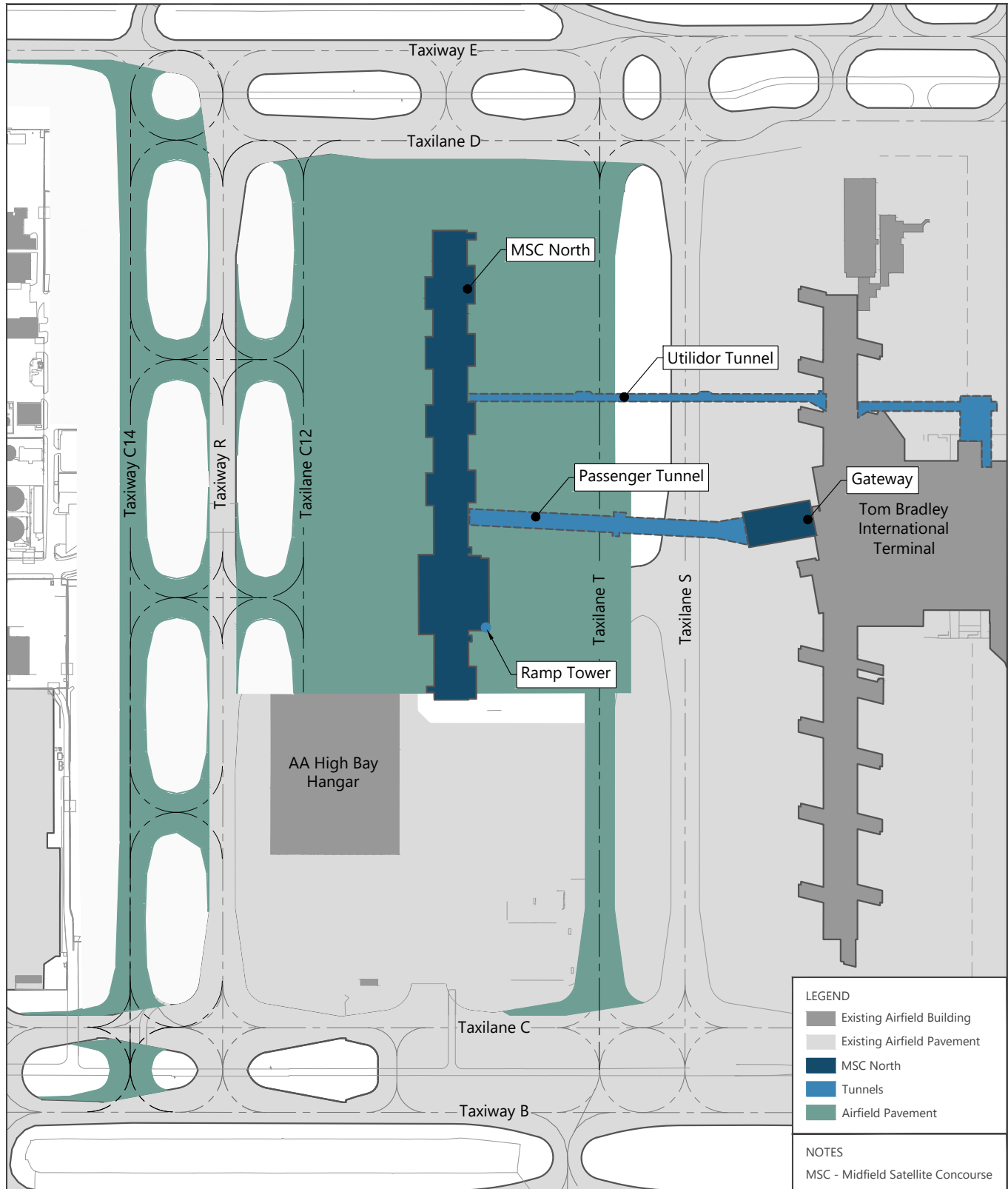


SOURCE: HNTB, Corp., Los Angeles International Draft ALP, July 2012; Ricondo & Associates, Inc., April 2019.

**FIGURE 2**



## MSC PROGRAM IDENTIFIED IN THE MSC EIR



SOURCE: HNTB, Corp., Los Angeles International Draft ALP, July 2012; Ricondo & Associates, Inc., April 2019.

**FIGURE 3**

**MSC NORTH  
APPROVED PROJECT OVERVIEW**

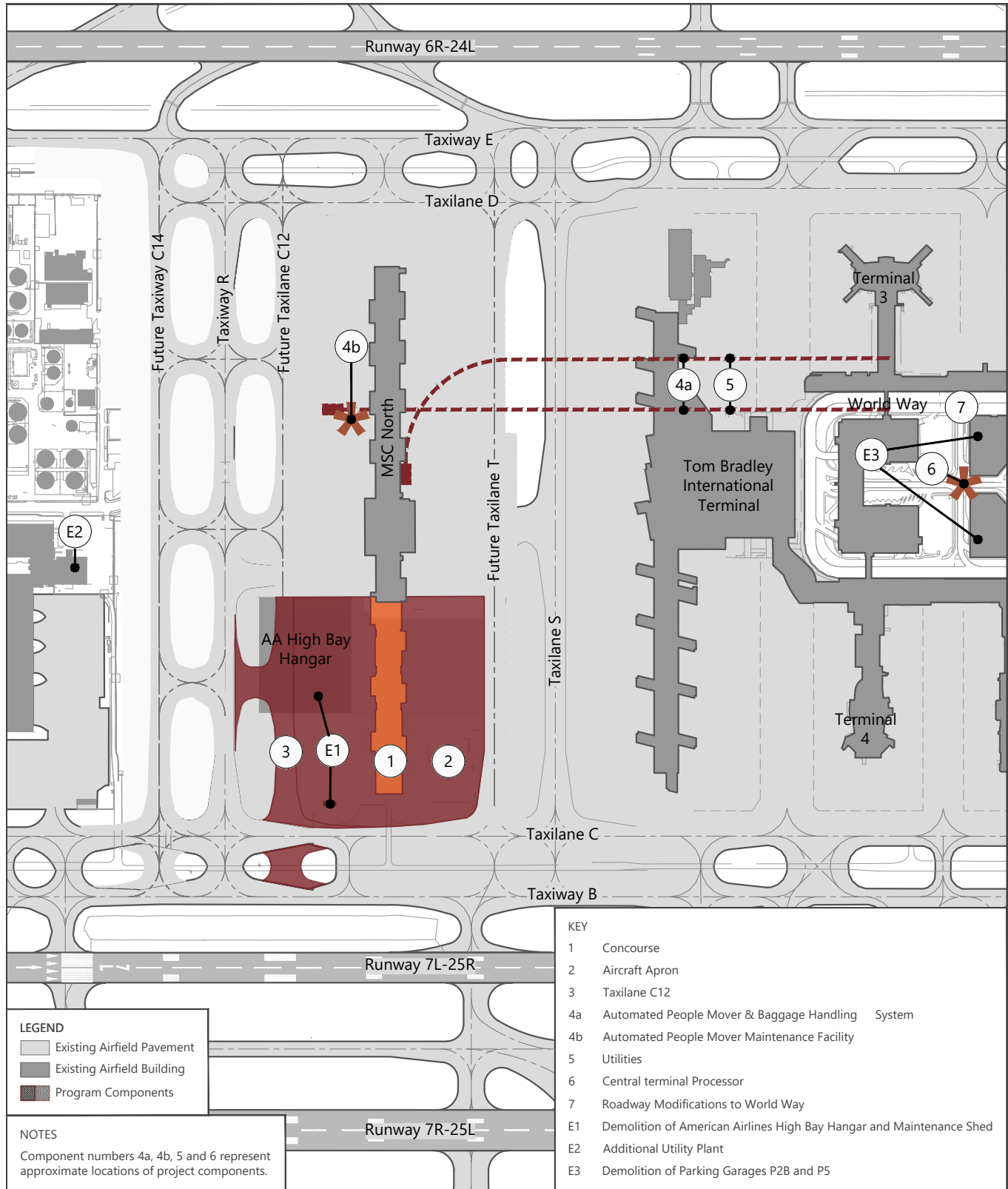


- Construction of a ramp tower, approximately 169 feet in height, to ensure that the LAX airport traffic control tower (ATCT) has a clear, unobstructed, and direct view of aircraft located on runways and taxiways in the vicinity of the MSC North Project. The ramp tower would be constructed on top of the MSC North concourse building.
- Construction of a three-level 'Gateway' building, including approximately 50,000 square feet of floor space, to facilitate passenger transition from TBIT to the underground walkway. The Gateway would provide Airline Club spaces on the concourse level.
- Relocation and/or removal of several existing airfield facilities located at the MSC North Project site.

The MSC Program components that are not part of the MSC North Project were identified in the MSC EIR as future phase(s) of the MSC Program. Components associated with the future phase(s) of the MSC Program, as described and analyzed in the MSC EIR, generally include: 1) the southerly extension of the MSC building and associated facilities; 2) extension of Taxilane C12; 3) utilities that support the future phase(s) of the MSC Program; and 4) a Central Terminal Processor (see **Figure 4**):

- Extension of the MSC North concourse: As previously proposed, the future phase(s) of the MSC Program would extend the MSC building south in one or more phases. The future phase(s) of the MSC Program was estimated to expand the MSC North building by a footprint of up to 160,000 square feet, with approximate dimensions of 1,000 feet in length (north-south) and between 140 feet and 160 feet in width (east-west), and the ability to serve both international and domestic flights and accommodate up to 18 gates for ADG III to ADG VI aircraft. The extension would include up to four levels and approximately 560,000 square feet of floor space for facilities such as passenger holdrooms, concessions, restrooms, airline lounges, utility rooms, and circulation.
- Central Terminal Processor (CTP). Construction of a dual level CTP in the CTA to provide (in part) MSC passenger processing facilities that cannot be fully accommodated in the existing CTA terminals. The CTP would process departing and arriving passengers from a facility that would be centrally positioned within the CTA where parking garages are currently located. The CTP would be constructed in the area where parking structures P2B and P5 are located and extend between World Way North and World Way South.
- Construction of a conveyance system to move passengers and baggage between the MSC and the CTP, and vice versa. The conveyance system for the future phase(s) of the MSC Program was planned for passenger and baggage circulation in both a sterile and secure/non-sterile format. A vertical circulation element and an airside APM were anticipated to convey checked-in passengers to the MSC. A maintenance facility to service the airside APM was also to have been constructed on Airport property.
- Utilities to accommodate the additional gates, the CTP, the automated people mover and baggage handling system, and facilities.
- Extension of Taxilane C12 south to connect to Taxilane C.
- Enabling projects, including:
  - Relocation and demolition of the American Airlines High Bay Hangar and American Airlines maintenance shed;
  - Additional utility plant; and
  - Relocation and demolition of parking garages P2B and P5.





Source: HNTB, Corp., Los Angeles International Draft ALP, July 2012; Ricondo & Associates, Inc., April 2019.

**FIGURE 4**

**FUTURE PHASES OF THE MSC PROGRAM IDENTIFIED IN THE MSC EIR**



Drawing: P:\Project-Chicago\LA\WALAX MSC South\06 - Environmental\04 - AutoCAD\MSC SOUTH-Project Description Exhibits\_20190719.dwg Layout: Fig 4 Plotted: Jul 19, 2019, 01:58PM

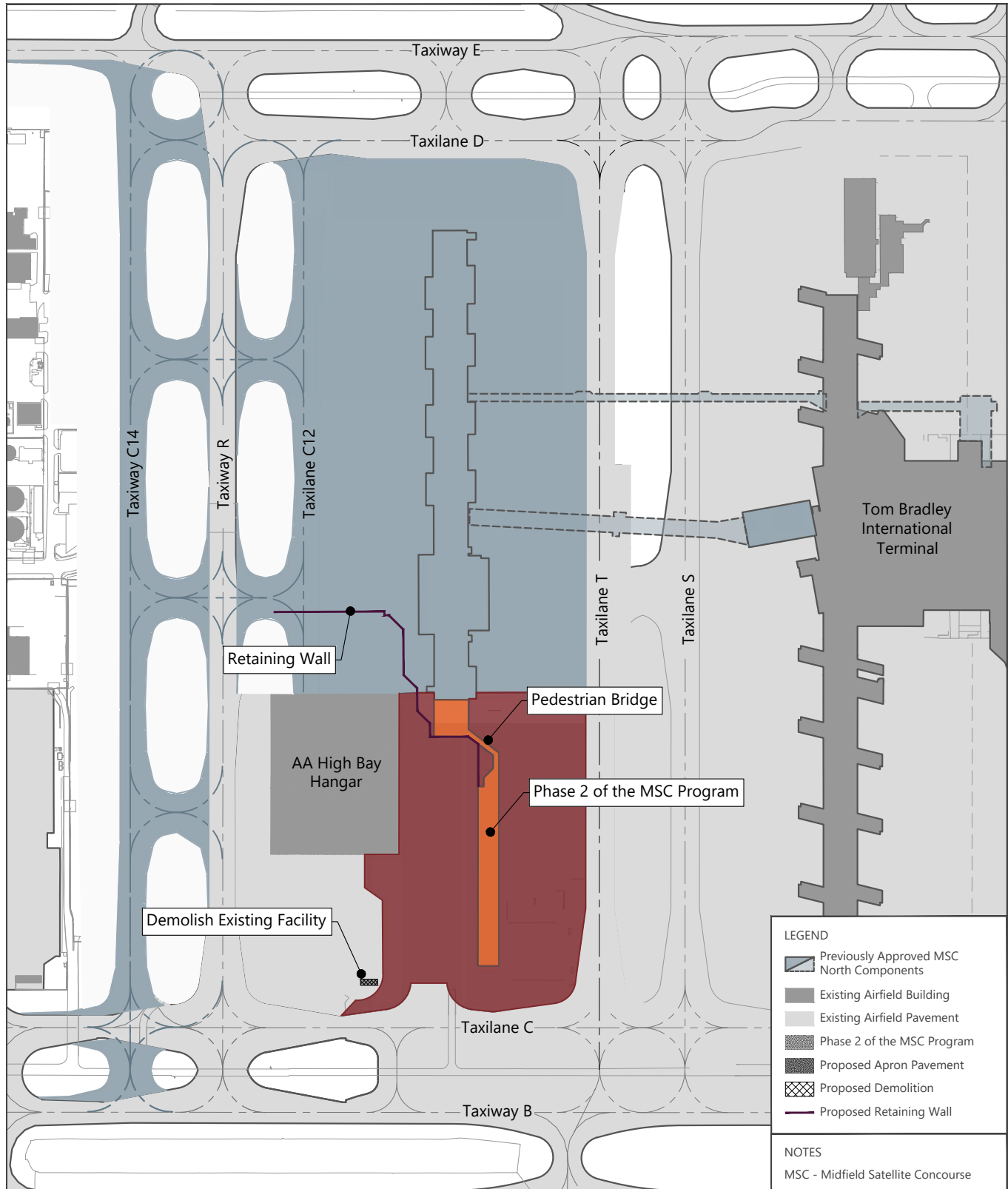
### 3. PROJECT DESCRIPTION

LAWA has now identified the next phase, Phase 2, of the MSC Program. Phase 2 of the MSC Program would consist of a two-story structure with approximately 100,000-120,000 square feet of floor space. The facility would have approximate dimensions of 700-800 feet in length (north-south) and approximately 70-80 feet in width (east-west), with the ability to serve domestic flights and accommodate up to 8 gates for ADG III aircraft. The facility would be located east of and adjacent to the full MSC Program building footprint approved in the MSC EIR and would be connected to the MSC North via an elevated pedestrian bridge. The original footprint for the MSC Program building would be preserved for additional future phase(s) of the MSC Program.

Phase 2 of the MSC Program would include construction of the following components, as shown on **Figure 5**:

- Connection to MSC North. The MSC North building would be extended to provide adequate space for aircraft operations at Gate 225A. The three-level extension would provide a total of approximately 45,000 square feet of floor space. The facility would have approximate dimensions of between 90 and 160 feet in length (north-south) and 120 feet in width (east-west). Phase 2 of the MSC Program would connect to this MSC North extension via a 20-foot wide elevated pedestrian bridge. Pedestrians would access Phase 2 of the MSC Program via a vertical circulation core at the north end of the facility.
- Apron pavement. Approximately 680,000 square feet of apron pavement on both the west and east sides of the concourse would be demolished and reconstructed.
- Hydrant fueling. A network of fueling hydrants and piping to provide fueling to each gate.
- Retaining wall. An approximate 125-foot long retaining wall to the west and south of MSC North.
- Demolition of the 1,500 square-foot American Airlines maintenance shed; and
- Utility connections, including extension of the existing sewer line.

Phase 2 of the MSC Program is consistent with the MSC EIR in that the building size, number of aircraft gates, and amount of aircraft apron demolition and reconstruction are less than that assumed in the MSC EIR. Additionally, the hydrant fueling, utility connections, and demolition of the 1,500 square-foot American Airlines maintenance shed were also identified and assessed as part of the future phase(s) of the MSC Program in the MSC EIR.



SOURCE: HNTB, Corp., Los Angeles International Draft ALP, July 2012; Ricondo & Associates, Inc., November 2018.

**FIGURE 5**



**PHASE 2 OF THE MSC PROGRAM**

### 3.1 OPERATIONAL CHARACTERISTICS

The overall objective of the MSC Program is to provide LAWA with the flexibility to accommodate existing demand for aircraft gates while modernizing other terminals, taxiway and apron pavement, and other facilities at LAX, and reduce reliance on the West Remote Gates/Pads. Consistent with the MSC EIR, the next phase of the MSC Program would operate as an “empty chair”, providing capacity for the temporary relocation of carrier operations during routine construction or modernization activities of existing facilities, and be supported by existing processing facilities.

The ability to accommodate ADG III aircraft at Phase 2 of the MSC Program is critical based on the characteristics of the commercial passenger fleet operating at LAX. According to published schedule information for the peak month of August 2018, approximately 77 percent of commercial passenger operations at LAX are ADG III aircraft operations. Phase 2 of the MSC Program would allow for eight ADG III gates that would alleviate any potential gate shortages during construction and modernization activities. It is anticipated that these gates could accommodate an average of 56 aircraft a day (7 turns per gate or 112 daily operations) providing facilities required to allow routine construction or modernization of existing facilities and reduce the reliance on the West Remote Gates/Pads.

Operational assumptions for Phase 2 of the MSC Program are further discussed in **Appendix A**.

### 3.2 CONSTRUCTION

Construction of the Phase 2 of the MSC Program is anticipated to occur over approximately 1.5-2.5 years; beginning in June 2020 and finishing by first quarter 2023. To the extent possible, construction laydown, staging areas, and employee contractor parking for the proposed facility would use the areas being used for MSC North construction activities, which will be substantially complete when construction of Phase 2 of the MSC Program begins. Construction haul routes to the proposed site would utilize Imperial Highway, Pershing Drive, and World Way West.

Assumptions regarding the schedule and the equipment and manpower estimates are provided in **Appendix B**.

## 4. CALIFORNIA ENVIRONMENTAL QUALITY ACT ANALYSIS

### 4.1 EVALUATION

To determine whether the environmental effects of Phase 2 of the MSC Program are within the scope of the MSC EIR, this evaluation considers whether the currently proposed phase would result in any new significant environmental effects that were not examined in the MSC EIR or any substantial increases in the severity of previously identified significant effects.

The certified MSC EIR (including the Notice of Preparation/Initial Study [NOP/IS] for the MSC EIR [refer to Appendix A of MSC EIR<sup>6</sup>]) determined that implementation of the future phase(s) of the MSC Program would have no impact impacts related to agricultural and forestry resources, mineral resources, or recreation. Similarly, Phase 2 of the MSC Program would not have any impacts related to agricultural and forestry resources, mineral resources, or recreation.

The certified MSC EIR (including the NOP/IS) determined that implementation of the future phase(s) of the MSC Program would have a less than significant impact, or a less than significant impact after mitigation, on aesthetics, biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, transportation/traffic, and utilities and service systems. LAWA would incorporate all feasible mitigation measures identified for the future phase(s) of the MSC Program developed in the MSC EIR into Phase 2 of the MSC Program. With incorporation of these mitigation measures, Phase 2 of the MSC Program would have less than significant impacts on aesthetics, biological resources, cultural resources, geology/soils, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, public services, transportation/traffic, and utilities and service systems.

The certified MSC EIR determined that future phase(s) of the MSC Program would result in significant and unavoidable impacts with regard to air quality, greenhouse gas emissions, human health, and construction traffic. Phase 2 of the MSC Program would also affect air quality, greenhouse gas emissions, human health risk, and construction traffic, but would not result in any new significant impacts that were not examined in the MSC EIR or any substantial increases in the severity of previously identified effects, as discussed below.

#### 4.1.1 AIR QUALITY, GREENHOUSE GAS EMISSIONS, AND HUMAN HEALTH

##### 4.1.1.1 CONSTRUCTION

As discussed in the MSC EIR, construction emissions for the MSC Program were analyzed in the LAX Master Plan Final EIR at a program level and were determined in the MSC EIR to not be substantively different from those identified in the LAX Master Plan Final EIR. The MSC EIR noted that a project-level environmental review would need to be initiated for any future phase(s) of the MSC Program once timing was determined. Now that the next phase, Phase 2, of the MSC Program has been identified, a project-level construction emissions inventory has been prepared.

The maximum daily emissions for Phase 2 of the MSC Program were calculated from a peak-month average day for each year of construction, based on the construction estimates and schedule included in **Appendix B**. The

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<sup>6</sup> Los Angeles World Airports, *Final Environmental Impact Report, Midfield Satellite Concourse*, June 2014, Appendix A.

maximum daily emission rates from Phase 2 of the MSC Program are shown in **Table 1**, as well as the South Coast Air Quality Management District (SCAQMD) CEQA construction emission thresholds for criteria pollutants, including: carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>) and volatile organic compounds (VOCs), sulfur dioxide (SO<sub>2</sub>), particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM<sub>10</sub>), and particulate matter with a diameter less than or equal to 2.5 micrometers (PM<sub>2.5</sub>). For comparison purposes, maximum daily mitigated construction emissions for Alternative D, as disclosed in the LAX Master Plan Final EIR, and the maximum daily construction emissions for the MSC North Project, are also shown in Table 1. Information regarding assumptions and methodologies are included in **Appendix C**.

**TABLE 1**      **MAXIMUM CONSTRUCTION EMISSIONS (LBS/DAY)**

| POLLUTANT         | ALTERNATIVE D<br>(FROM LAX<br>MASTER PLAN<br>FINAL EIR) | MSC NORTH<br>PROJECT (FROM<br>MSC EIR) | PHASE 2 OF THE<br>MSC PROGRAM | SCAQMD<br>THRESHOLD | NEW SIGNIFICANT<br>IMPACT OR<br>SUBSTANTIAL<br>INCREASE IN<br>SEVERITY |
|-------------------|---|--|-------------------------------|---------------------|--|
| CO                | 5,476   | 1,235                                  | 33                            | 550                 | No   |
| VOC               | 847   | 118                                    | 10                            | 75                  | No   |
| NO <sub>x</sub>   | 11,203  | 1,156                                  | 94                            | 100                 | No   |
| SO <sub>2</sub>   | 33  | 4                                      | 0                             | 150                 | No   |
| PM <sub>10</sub>  | 3,265   | 308                                    | 17                            | 150                 | No   |
| PM <sub>2.5</sub> | N/A   | 105                                    | 5                             | 55                  | No   |

NOTE:

N/A = not available

SOURCES: City of Los Angeles, Los Angeles World Airports *Final Environmental Impact Report, Los Angeles International Airport Proposed Master Plan Improvements*, April 2004; U.S. Department of Transportation, Federal Aviation Administration, *Environmental Impact Statement, Los Angeles International Airport Proposed Master Plan Improvements*, January 2005; City of Los Angeles, Los Angeles World Airports (LAWA), *Final Environmental Impact Report, Los Angeles International Airport (LAX) Midfield Satellite Concourse (MSC)*, June 2014; South Coast Air Quality Management District, "SCAQMD Air Quality Significance Thresholds," March 2015. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>; Ricondo & Associates Inc., March 2019.

As discussed in Section 2.1, the main components of the MSC Program were identified and analyzed in the LAX Master Plan EIR. As shown in Table 1, construction emissions of Phase 2 of the MSC Program are less than two percent of the maximum daily emissions reported in the LAX Master Plan EIR and are all below the SCAQMD thresholds for all pollutants, with incorporation of construction-related mitigation and control measures as identified in the MSC EIR. The MSC EIR identified one project-specific Mitigation Measure, MM-AQ (MSC)-1 – Preferential Use of Renewable Diesel Fuel, to address construction-related emissions associated with the approved MSC North Project. Additionally, as part of the LAX Master Plan, LAWA adopted four control measures designed to address air quality impacts related to implementation of the LAX Master Plan. All four of these control measures were incorporated into the MSC EIR: LAX-AQ-1 – General Air Quality Control Measures; LAX-AQ-2 – Construction-Related Measures; LAX-AQ-3 – Transportation-Related Mitigation Measures; and LAX-AQ-4 – Operations-Related Control Measures. All of these mitigation measures would be applied to the construction of Phase 2 of the MSC Program. No additional mitigation measures would be required for Phase 2 of the MSC Program. Therefore, construction-related criteria pollutant emissions of Phase 2 of the MSC Program would not be a new significant impact or a substantial increase in severity of a significant effect previously examined in the MSC EIR.

Construction of Phase 2 of the MSC Program would also result in greenhouse gas emissions. Based on the same assumptions and methodologies used for criteria pollutants, it is estimated that amortized construction of Phase 2

of the MSC Program would result in approximately 90 metric tons of CO<sub>2</sub> equivalent (MTCO<sub>2e</sub>).<sup>7</sup> As shown in Table 4.2-15 of the MSC EIR, amortized construction greenhouse gas emissions for the future phase(s) of the MSC Program were estimated at approximately 10,000 MTCO<sub>2e</sub>. Therefore, greenhouse gas emissions for Phase 2 of the MSC Program are consistent with the analysis presented in the MSC EIR.

Construction of Phase 2 of the MSC Program may also result in the release of toxic air contaminants (TAC) that can pose a risk to human health, including health risks to on-Airport workers, cancer risks and chronic non-cancer hazards, and acute non-cancer hazard risks. As discussed in the MSC EIR, construction of the MSC North Project would not result in significant construction-related impacts related to human health. Based on the comparison of construction emissions shown in Table 1 for the MSC North Project and Phase 2 of the MSC Program, construction emissions for Phase 2 of the MSC Program are consistent with the analysis presented in the MSC EIR. Because Phase 2 of the MSC Program would not exceed applicable standards, health impacts would be avoided. Therefore, impacts related to human health would not be a new significant impact or a substantial increase in severity of a significant effect previously examined in the MSC EIR.

#### 4.1.1.2 OPERATIONS

The MSC EIR analyzed operational emissions, for both criteria pollutants and greenhouse gases, from the future phase(s) of the MSC Program at a programmatic level for on-airport emissions, including those from aircraft, Ground Support Equipment (GSE), and Auxiliary Power Unit (APU) operations, on-airport roadways, and stationary sources. As shown in Tables 4.1-37 through 4.1-42 of the MSC EIR, project-related incremental criteria pollutant emissions for operations for the future phase(s) of the MSC Program were shown to be either zero or negative when comparing the future with and without MSC Program, with the exception of stationary source emissions.<sup>8</sup> As shown in Tables 4.2-14 and 4.2-15 of the MSC EIR, greenhouse gas emissions for the future phase(s) of the MSC Program would exceed the significance threshold and would result in a significant impact with regard to greenhouse gas emissions. However, the MSC EIR noted that a project-level environmental review would need to be initiated for any future phase(s) of the MSC Program once timing was determined. Now that the next phase, Phase 2, of the MSC Program has been identified, emissions from the MSC EIR have been evaluated for changes due to the proposed project.

Phase 2 of the MSC Program would not increase operations at LAX, but would provide LAWA with the flexibility to accommodate existing demand for aircraft gates while modernizing other terminals, taxiway and apron pavement, and other facilities at LAX, and reduce reliance on the West Remote Gates/Pads. . As discussed in Appendix A, Phase 2 of the MSC Program would operate as an "empty chair", providing capacity for the temporary relocation of carrier operations during routine construction or modernization activities of existing facilities, and be supported by existing processing facilities. As such, use of Phase 2 of the MSC Program, including airlines and flight schedule, is currently unknown. However, by shifting operations from existing facilities to the next phase of the MSC Program, taxi routes and associated taxi distances/times would fluctuate based on the location of the construction or modernization activities. Potential changes in taxi distances are documented in Appendix A. Taxi routes and associated taxi distances/times directly correlate to operational aircraft emissions (including greenhouse gases and human health). However, based on the assumptions and methodology in Appendix A, changes in taxi distances to/from Phase 2 of

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<sup>7</sup> In accordance with SCAQMD guidance, GHG emissions from construction have been amortized over the 30-year lifetime of the proposed project to enable comparison to the SCAQMD and LA CEQA thresholds of significance (i.e., total construction GHG emissions were divided by 30 to determine an annual construction emissions estimate comparable to operational emissions).

<sup>8</sup> Emissions from stationary sources would increase with the future phase(s) of the MSC Program on a lbs/day basis; however, emissions were substantially below the SCAQMD thresholds for all pollutants.

the MSC Program as compared to other existing facilities would, on average, be similar to or less than the resulting taxi distances/times if Phase 2 of the MSC Program was not implemented. Therefore, based on the analysis in Appendix A, it is assumed that taxi distances/times at the Airport would not significantly change from what was previously evaluated in the MSC EIR, and Phase 2 of the MSC Program would not result in a significant increase in operational aircraft emissions, including greenhouse gases. However, as Phase 2 of the MSC Program would reduce the use of the West Remote Gates/Pads, aircraft movements in the center of the airfield would increase. This increase, as discussed in the MSC EIR, causes incremental exceedances of 1-hour acrolein acute hazard indices at receptors on the north and south fence-lines of LAX for the MSC North Project: similar results are expected for Phase 2 of the MSC Program consistent with the analysis presented in the MSC EIR. Therefore, it is expected that Phase 2 of the MSC Program would have significant impacts to acute non-cancer health hazard impacts, as previously identified in the MSC EIR.

As noted in the MSC EIR, the acute Reference Exposure Level (REL) for acrolein has an uncertainty factor of 60.9. This factor indicates a moderate uncertainty in the REL based on specific sources of variability not addressed in the toxicological studies, such as individual variation and interspecies differences. Although the maximum acute hazard quotients for acrolein during operations of the proposed MSC is greater than 1, it should be noted that the acute REL is set at or below a level at which no adverse health impacts are expected for the majority of the population. Hence, it represents the tail-end of a distribution and not a specific "bright line" beyond which adverse effects are certain; instead any adverse acute non-cancer health effects (mucous membrane irritation) would be part of a complex probabilistic process. Although the maximum acute hazard quotient estimated as 1.9 is above the threshold of significance of 1, the value is still close to the threshold for acute effects, given the uncertainty in the toxicity factor, and may represent minimal actual acute non-cancer health hazards. Thus, an acute hazard quotient of 1.9 does not mean that adverse effects would definitely occur in the receptor population; rather, it indicates that such effects cannot be ruled out on the basis of current knowledge.

Phase 2 of the MSC Program would not result in any change to traffic distribution (passenger pick-up or drop-off) within the CTA; therefore, emissions from on-airport roadways would be consistent with those identified in the MSC EIR. Furthermore, emissions from stationary sources as part of Phase 2 of the MSC Program are accounted for in the MSC EIR. The MSC EIR assumed up to 560,000 square feet of floor space for the future phase(s) of the MSC Program and Phase 2 of the MSC Program would be only approximately 100,000 square feet, less than 20 percent of the floor space analyzed. However, the MSC EIR assumed that passengers would access the future phase(s) of the MSC Program via an APM. Although a passenger walkway between TBIT and the MSC is being constructed as part of MSC North, the APM is not scheduled to be operational before construction of Phase 2 of the MSC Program. Conservatively, it is assumed that busing operations as planned under the MSC North Project would expand to the southern gates and continue through Phase 2 of the MSC Program.

For comparison to busing emissions identified in the MSC EIR, it is assumed that busing operations under Phase 2 of the MSC Program would be double the busing emissions assumed for the MSC North Project. Incremental peak operational emissions for the future phase(s) of the MSC Program, as identified in the MSC EIR, and for the projected busing emissions are shown in **Table 2**. As discussed in Section 4.1.9 of the MSC EIR, operations of the future phase(s) of the MSC Program would not exceed the SCAQMD significance thresholds for CO, VOC, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>. As shown in Table 2, the additional emissions associated with busing operations, when added to the total incremental emissions from the MSC EIR, would be consistent with the analyses presented in the MSC EIR.

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<sup>9</sup> California Environmental Protection Agency, Office of Environmental Health Hazard Assessment, [Air Toxics Hot Spots Program Technical Support Document for the Derivation of Noncancer Reference Exposure Levels](#), December 2008.



While the emissions shown in Table 2 are specific to criteria pollutants, changes to greenhouse gas emissions and human health risk from the increased busing operations are similarly negligible and would also be consistent with the analyses presented in the MSC EIR.

TABLE 2 INCREMENTAL OPERATIONAL EMISSIONS (LBS/DAY)

| POLLUTANT         | MSC PROGRAM INCREMENTAL CHANGE <sup>1</sup> (FROM MSC EIR) | PROJECTED BUSING EMISSIONS <sup>2</sup> | TOTAL INCREMENTAL CHANGE | SCAQMD THRESHOLD | NEW SIGNIFICANT IMPACT OR SUBSTANTIAL INCREASE IN SEVERITY |
|-------------------|--|---|--------------------------|------------------|--|
| CO                | -91  | 1.0                                     | -92                      | 550              | No   |
| VOC               | 24   | 0.0                                     | 24                       | 75               | No   |
| NO <sub>x</sub>   | -32  | 13.0                                    | -19                      | 100              | No   |
| SO <sub>2</sub>   | -5.1   | 0.0                                     | -5.1                     | 150              | No   |
| PM <sub>10</sub>  | -1.1   | 0.0                                     | -1.1                     | 150              | No   |
| PM <sub>2.5</sub> | -1.1   | 0.0                                     | -1.1                     | 55               | No   |

NOTES:

- As identified in the EIR, in accordance with the South Coast Air Quality Management District’s *Air Quality Handbook*, a significant air quality impact would occur if the incremental increase in operations-related emissions attributable to a proposed project would be greater than the daily emission thresholds. EIR incremental change is the change between the proposed future phase(s) of the MSC Program operational emissions and the No Project operational emissions for 2025.
- For purposes of this analysis, it is assumed that busing operations under the next phase of the MSC Program would be double the busing emissions assumed for the MSC North Project.

SOURCE: City of Los Angeles, Los Angeles World Airports (LAWA), *Final Environmental Impact Report, Los Angeles International Airport (LAX) Midfield Satellite Concourse (MSC)*, June 2014; South Coast Air Quality Management District, “SCAQMD Air Quality Significance Thresholds,” March 2015. Available at: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf>; Ricondo & Associates Inc., March 2019.

### 4.1.2 CONSTRUCTION TRAFFIC

Implementation of the future phase(s) of the MSC Program would generate vehicle traffic associated with workers traveling to and from the construction employee parking areas, haul/delivery trips, and miscellaneous construction-related travel. These trips could result in traffic impacts on the local roadway system during the construction period. As discussed in the MSC EIR, construction trips for the MSC Program were analyzed in the LAX Master Plan Final EIR at a program level and were determined in the MSC EIR to not be substantively different from that assumed in the LAX Master Plan Final EIR. Now that the next phase, Phase 2, of the MSC Program has been identified, a project-level qualitative construction traffic analysis has been prepared.

Project-generated traffic, including employee and materials hauling/delivery trips, for Phase 2 of the MSC Program were calculated based on the construction estimates and schedule included in Appendix B. **Table 3** identifies the peak-month average construction day activity for construction trips by hour. All trips are calculated in terms of Passenger Car Equivalents (PCE). The PCE is 1.0 for employee vehicles and 2.5 for haul/delivery trucks. Additional assumptions used in the analysis are presented in **Appendix D**.

Consistent with LAX Master Plan Commitment ST-14 (Construction Employee Shift Hours), with which Phase 2 of the MSC Program would comply, employees are assumed to be on-site prior to the a.m. commuter peak period of 7:00 a.m. to 9:00 a.m. and off-site prior to the p.m. commuter peak period of 4:30 p.m. to 6:30 p.m. It was conservatively assumed for this analysis that haul/delivery trucks would be operating consistently throughout the day, including during the a.m. and p.m. commuter peak period; therefore, the only construction-related vehicles conservatively assumed in the analysis are haul/delivery trucks. Consistent with the MSC EIR, haul/delivery truck

trips are limited to accessing the construction staging area via Imperial Highway and Pershing Drive in accordance with LAX Master Plan Commitment ST-22 (Designated Truck Routes), which stipulates that deliveries for dirt, aggregate, and other materials will use designated freeways and non-residential streets.

For purposes of this analysis, the 10 additional PCE haul/delivery truck trips were added to the baseline 2018 traffic volumes (shown below in **Table 4**) to assess the percent traffic increase caused by construction-related trips for Phase 2 of the MSC Program. It was estimated that the intersections along the designated construction hauling routes, including Imperial Highway/Main Street and Imperial Highway/Pershing Drive, are operating at a level of service (LOS) C or better under future baseline conditions. Based on this LOS and City of Los Angeles Department of Transportation (LADOT) criteria, a significant impact would occur if the project-related increase to traffic is four percent or greater. However, the 10 additional PCE haul/delivery truck trips account for less than two percent of the total traffic in the westbound through and eastbound through movements of Imperial Highway and Main Street. Similarly, the additional construction-related trips account for less than two percent of the total traffic in the westbound right and southbound left movements of Imperial Highway and Pershing Drive. As such, the construction trips related to Phase 2 of the MSC Program would be consistent with the analyses presented in the MSC EIR.

TABLE 3 PEAK CONSTRUCTION TRIPS (PCE)

| HOUR                 | EMPLOYEE VEHICLES (IN) | EMPLOYEE VEHICLES (OUT) | HAUL/DELIVERY TRUCKS (IN) | HAUL/DELIVERY TRUCKS (OUT) | TOTAL VEHICLE TRIPS |
|----------------------|------------------------|-------------------------|---------------------------|----------------------------|---------------------|
| 0:00 – 1:00          | -                      | -                       | -                         | -                          | -                   |
| 1:00 – 2:00          | -                      | -                       | -                         | -                          | -                   |
| 2:00 – 3:00          | -                      | -                       | -                         | -                          | -                   |
| 3:00 – 4:00          | -                      | -                       | -                         | -                          | -                   |
| 4:00 – 5:00          | 50                     | -                       | -                         | -                          | 50                  |
| 5:00 – 6:00          | -                      | -                       | 13                        | 13                         | 26                  |
| 6:00 – 7:00          | -                      | -                       | 13                        | 13                         | 26                  |
| <b>7:00 – 8:00</b>   | -                      | -                       | <b>10</b>                 | <b>10</b>                  | <b>20</b>           |
| <b>8:00 – 9:00</b>   | -                      | -                       | <b>10</b>                 | <b>10</b>                  | <b>20</b>           |
| 9:00 – 10:00         | -                      | -                       | 10                        | 10                         | 20                  |
| 10:00 – 11:00        | -                      | -                       | 10                        | 10                         | 20                  |
| 11:00 – 12:00        | -                      | -                       | 10                        | 10                         | 20                  |
| 12:00 – 13:00        | -                      | -                       | 10                        | 10                         | 20                  |
| 13:00 – 14:00        | -                      | -                       | 10                        | 10                         | 20                  |
| 14:00 – 15:00        | -                      | -                       | 10                        | 10                         | 20                  |
| 15:00 – 16:00        | -                      | 50                      | 10                        | 10                         | 20                  |
| <b>16:00 – 17:00</b> | -                      | -                       | <b>10</b>                 | <b>10</b>                  | <b>20</b>           |
| <b>17:00 – 18:00</b> | -                      | -                       | -                         | -                          | -                   |
| <b>18:00 – 19:00</b> | -                      | -                       | -                         | -                          | -                   |
| 19:00 – 20:00        | -                      | -                       | -                         | -                          | -                   |
| 20:00 – 21:00        | -                      | -                       | -                         | -                          | -                   |
| 21:00 – 22:00        | -                      | -                       | -                         | -                          | -                   |
| 22:00 – 23:00        | -                      | -                       | -                         | -                          | -                   |
| 23:00 – 24:00        | -                      | -                       | -                         | -                          | -                   |
| <b>DAILY TOTAL</b>   | <b>50</b>              | <b>50</b>               | <b>126</b>                | <b>126</b>                 | <b>352</b>          |

NOTES:

All trips are calculated in terms of Passenger Car Equivalents (PCE). The PCE for employee vehicles is 1.0 and 2.5 for haul/delivery trucks.

The a.m. commuter peak period is identified as 7:00 a.m. to 9:00 a.m., while the p.m. commuter peak period is identified as 4:30 p.m. to 6:30 p.m.

SOURCE: Ricondo & Associates, Inc., February 2019.

TABLE 4 CONSTRUCTION TRAFFIC ANALYSIS

| INTERSECTION                    | PEAK HOUR | INTERSECTION MOVEMENT | BASELINE VOLUME | ADDITIONAL PCE TRIPS | TOTAL VOLUME | PERCENT INCREASE |
|---------------------------------|-----------|-----------------------|-----------------|----------------------|--------------|------------------|
| Imperial Highway/Main Street    | AM        | Westbound Through     | 1,429           | 10                   | 1,439        | 0.7%             |
| Imperial Highway/Main Street    | PM        | Westbound Through     | 810             | 10                   | 820          | 1.2%             |
| Imperial Highway/Main Street    | AM        | Eastbound Through     | 920             | 10                   | 930          | 1.1%             |
| Imperial Highway/Main Street    | PM        | Eastbound Through     | 1,156           | 10                   | 1,166        | 0.9%             |
| Imperial Highway/Pershing Drive | AM        | Westbound Right       | 1,497           | 10                   | 1,507        | 0.7%             |
| Imperial Highway/Pershing Drive | PM        | Westbound Right       | 619             | 10                   | 629          | 1.6%             |
| Imperial Highway/Pershing Drive | AM        | Southbound Left       | 799             | 10                   | 809          | 1.3%             |
| Imperial Highway/Pershing Drive | PM        | Southbound Left       | 991             | 10                   | 1,001        | 1.0%             |

NOTES:

PCE=Passenger Car Equivalents

The a.m. commuter peak period is identified as 7:00 a.m. to 9:00 a.m., while the p.m. commuter peak period is identified as 4:30 p.m. to 6:30 p.m.

SOURCE: Ricondo and Associates, Inc., June 2019.

Consistent with the MSC EIR, this analysis incorporates traffic-related mitigation and control measures as previously identified in the MSC EIR. The MSC EIR identified 13 applicable LAX Master Plan commitments and mitigation measures to address traffic impacts, including:

- C-1. Establishment of a Ground Transportation/Construction Coordination Office.
- C-2. Construction Personnel Airport Orientation.
- ST-9. Construction Deliveries.
- ST-12. Designated Truck Delivery Hours.
- ST-14. Construction Employee Shift Hours.
- ST-16. Designated Haul Routes.
- ST-17. Maintenance of Haul Routes.
- ST-18. Construction Traffic Management Plan.
- ST-22. Designated Truck Routes.

These commitments and mitigation measures would be implemented during construction of Phase 2 of the MSC Program, as applicable, in a manner consistent with those suggested in the MSC EIR. No additional mitigation measures would be required for Phase 2 of the MSC Program.

## 4.2 RECOMMENDED DOCUMENTATION

Public Resources Code Section 21083 and Section 15168 of the State CEQA Guidelines identifies the circumstances that necessitate whether additional environmental documentation must be prepared after a program EIR has been adopted for a project. The State CEQA Guidelines state that:

- (c) Use with Later Activities. Later activities in the program must be examined in light of the program EIR to determine whether an additional environmental document must be prepared.

- (1) If a later activity would have effects that were not examined in the program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration. That later analysis may tier from the program EIR as provided in Section 15152.
- (2) If the agency finds that pursuant to Section 15162, no subsequent EIR would be required, the agency can approve the activity as being within the scope of the project covered by the program EIR, and no new environmental document would be required. Whether a later activity is within the scope of a program EIR is a factual question that the lead agency determines based on substantial evidence in the record. Factors that an agency may consider in making that determination include, but are not limited to, consistency of the later activity with the type of allowable land use, overall planned density and building intensity, geographic area analyzed for environmental impacts, and covered infrastructure, as described in the program EIR.
- (3) An agency shall incorporate feasible mitigation measures and alternatives developed in the program EIR into later activities in the program.
- (4) Where the later activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were within the scope of the program EIR.
- (5) A program EIR will be most helpful in dealing with later activities if it provides a description of planned activities that would implement the program and deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed project description and analysis of the program, many later activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required.

Based on the evaluation of environmental impacts in Section 4.1, Phase 2 of the MSC Program would not trigger any of the conditions described in Public Resources Code Section 21166 and State CEQA Guidelines Section 15162 requiring preparation of a subsequent EIR. When an EIR has been certified or a negative declaration adopted for a project, no subsequent EIR shall be prepared for that project unless the lead agency determines, on the basis of substantial evidence in the light of the whole record, one or more of the following:

- (1) Substantial changes are proposed in the project which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (2) Substantial changes occur with respect to the circumstances under which the project is undertaken which will require major revisions of the previous EIR or Negative Declaration due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects; or
- (3) New information of substantial importance, which was not known and could not have been known, with the exercise of reasonable diligence at the time the previous EIR was certified as complete or the Negative Declaration was adopted, shows any of the following:
  - (A) *The project will have one or more significant effects not discussed in the previous EIR or Negative Declaration;*

- (B) Significant effects previously examined will be substantially more severe than shown in the previous EIR;*
- (C) Mitigation measures or alternatives previously found not to be feasible would in fact be feasible, and would substantially reduce one or more significant effects of the project, but the project proponents decline to adopt the mitigation measure or alternative; or*
- (D) Mitigation measures or alternatives which are considerably different from those analyzed in the previous EIR would substantially reduce one or more significant effects on the environment, but the project proponents decline to adopt the mitigation measure or alternative.*

Pursuant to Section 15168 of the State CEQA Guidelines, Phase 2 of the MSC Program would not result in any effects that were not examined in the MSC EIR; anticipated effects of construction and implementation of Phase 2 of the MSC Program are consistent with the analyses presented in the MSC EIR. Additionally, the scope of Phase 2 of the MSC Program is consistent with the future phase(s) of the MSC Program identified and analyzed in the MSC EIR. Finally, all feasible mitigation measures identified in the MSC EIR will be applied and incorporated into Phase 2 of the MSC Program. Therefore, as Phase 2 of the MSC Program is consistent with the assumptions and environmental effects identified in the MSC EIR for the future phase(s) of the MSC Program, no new environmental documentation is required.

# **EXHIBIT**

# **7**

# LAX NASIP Technical Analyses

Status Update

PRESENTED TO:  
NASIP Steering Committee

PRESENTED BY:  
Ricondo

PRESENTED ON:  
Tuesday, June 5, 2018



## Agenda

- Aircraft Delays
- Landside Roadway Concepts
- Concourse 0 and Terminal 9 Status
- Next Steps

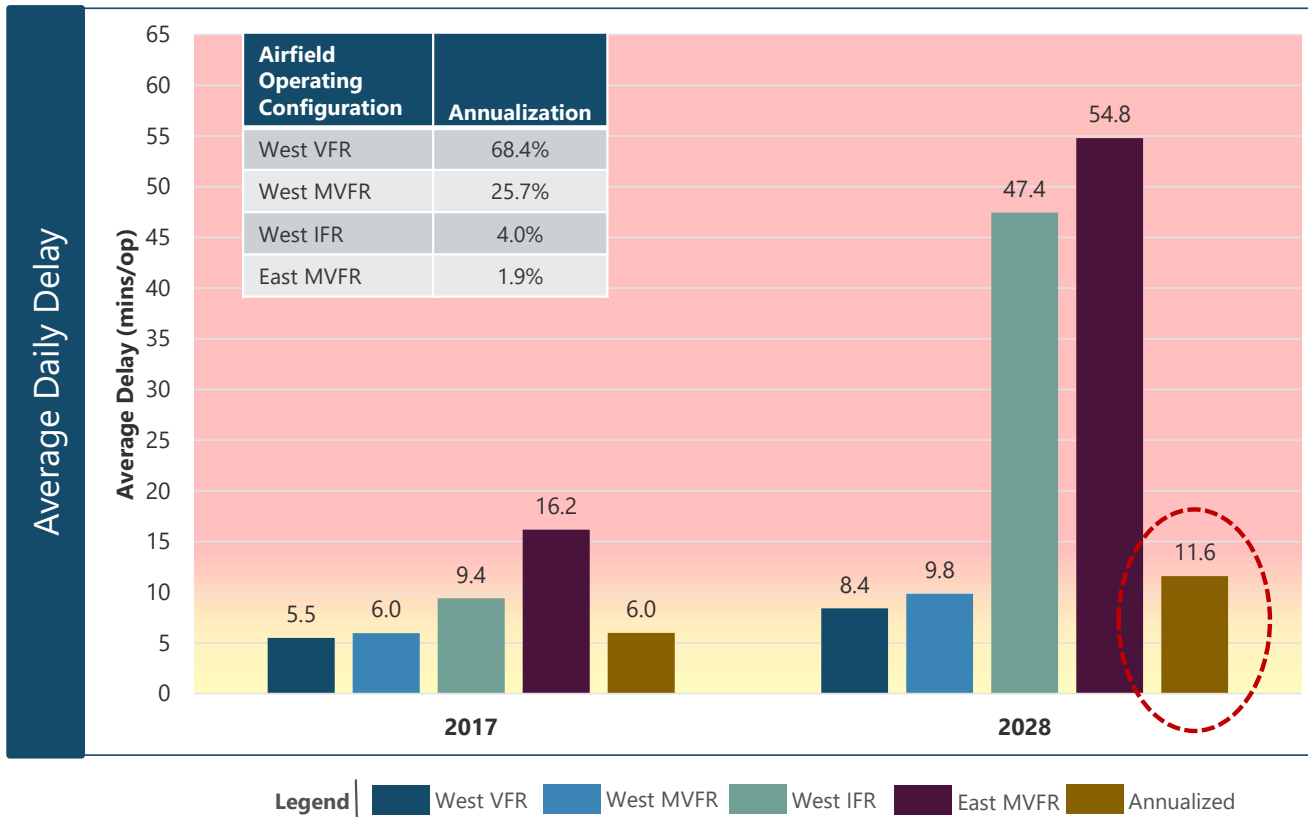
# Aircraft Delays

## Airfield Demand/Capacity Analysis

- 2017 Baseline Completed
  - Existing airfield with Taxiway C14 and MSC-N
- 2028 No Project Completed
  - Same airfield as 2017 Baseline
- 2017 and 2028 With Project (Airfield Only) Completed
  - Runway 6L-24R Exit Improvements
  - Westward Extension of Taxiway D
- 2028 With Project (Airfield and Terminal) Sensitivity Testing
  - Concourse 0 and Terminal 9 analyzed independently (completed)
  - Both scenarios show slight reduction in delay
  - Concourse 0 and Terminal 9 combined are currently being evaluated

CONFIDENTIAL DRAFT - FOR DELIBERATIVE PURPOSES ONLY

# 2017 Baseline and 2028 No Project Average Daily Delay Summary

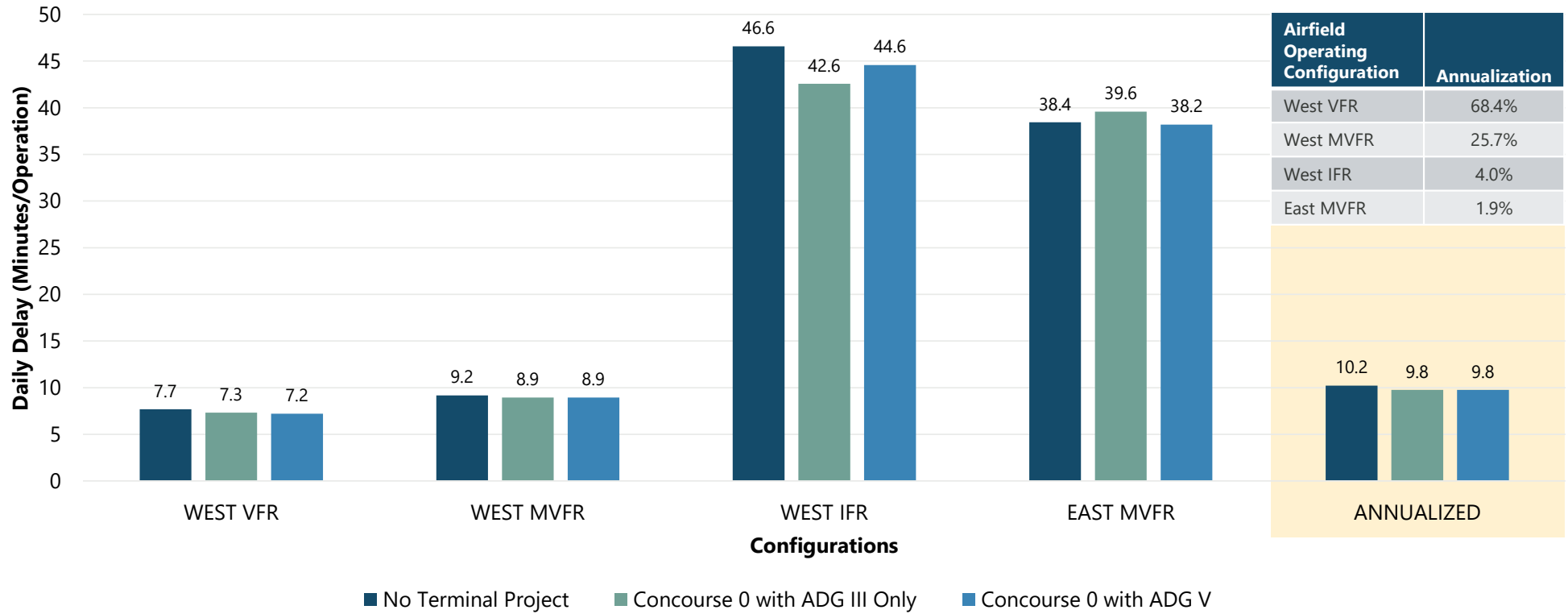


- West VFR and West MVFR configurations perform with **less than 10 minutes** of delay per operation at 2028 activity level
- The less efficient configurations, East MVFR and West IFR, experience significant levels of congestion at 2028 activity level

Source: SIMMOD output, March 2018.

# Concourse 0 Sensitivity Testing – 2028

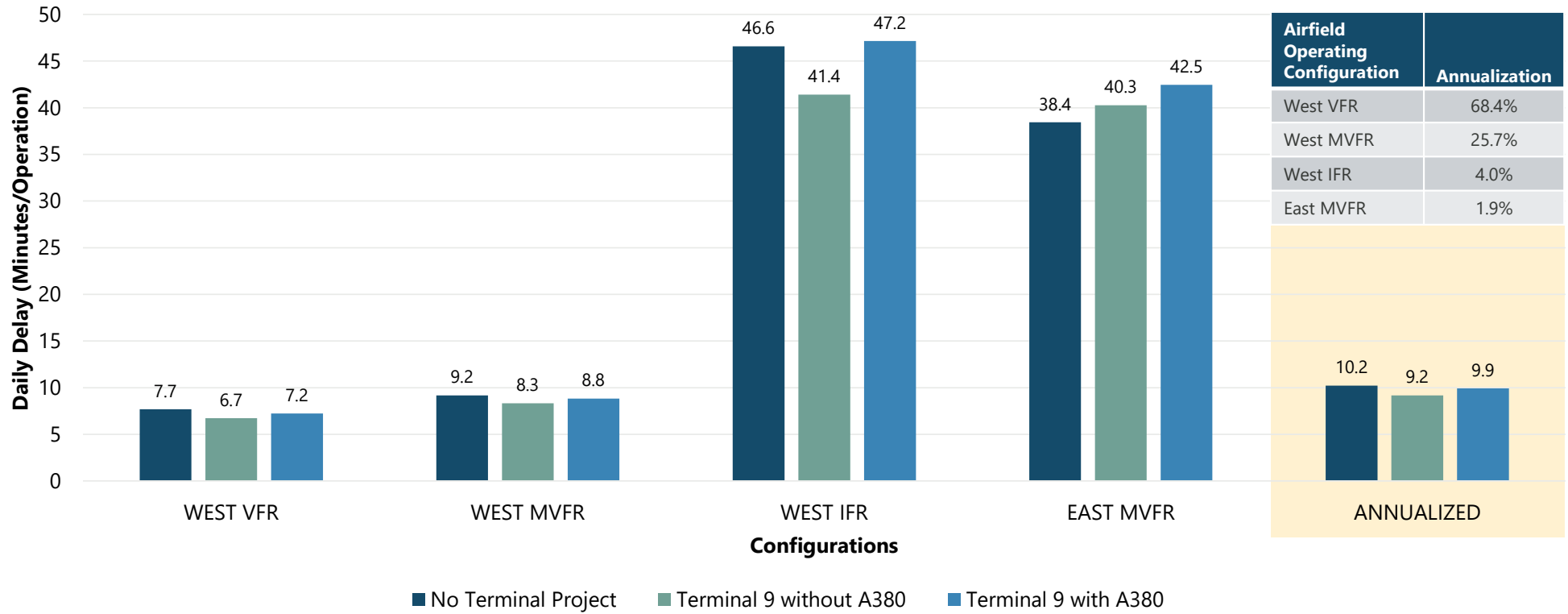
## Average Daily Delay Summary



NOTE: All models used for the Concourse 0 sensitivity tests do not include gate reconfiguration at Terminals 5 and 6.  
 SOURCE: SIMMOD output, May 2018.

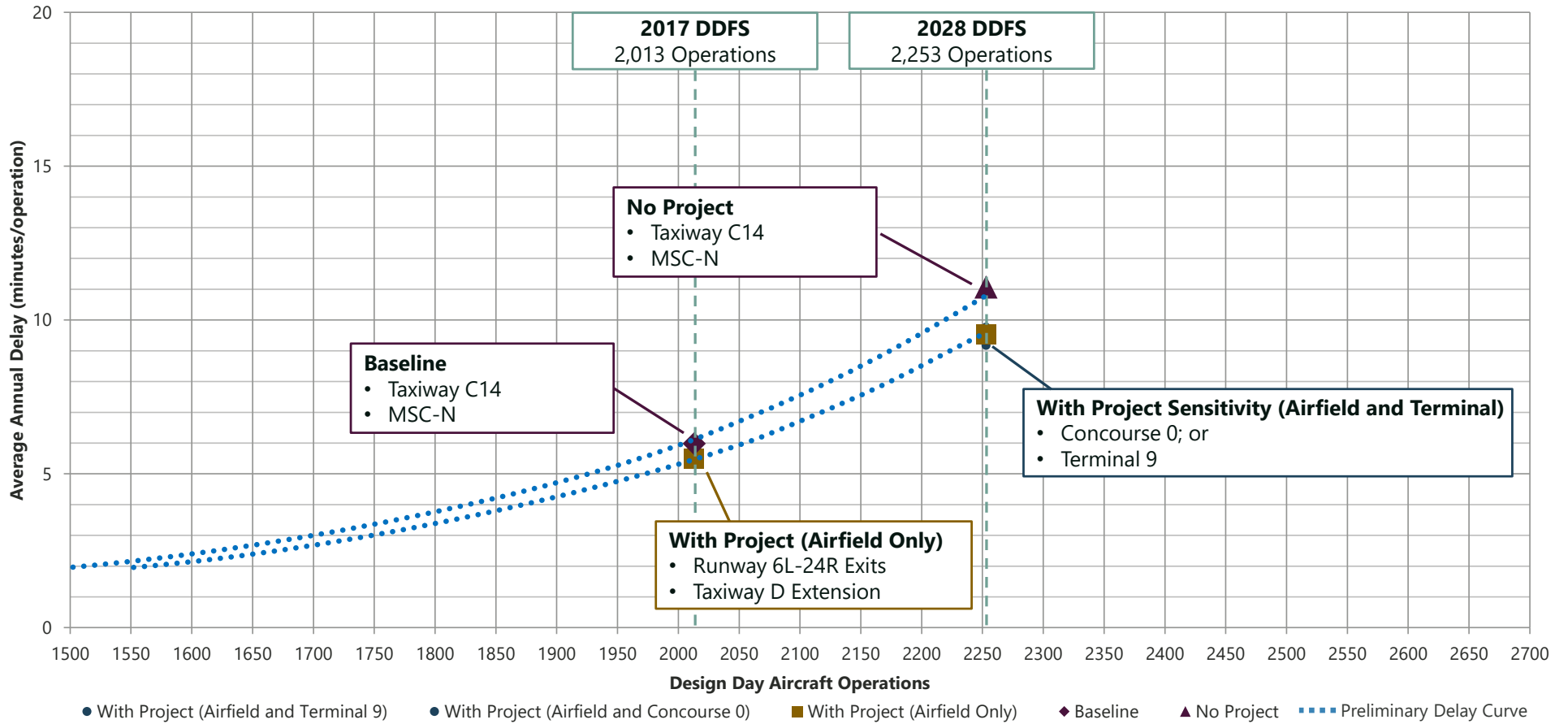
# Terminal 9 Sensitivity Testing – 2028

## Average Daily Delay Summary



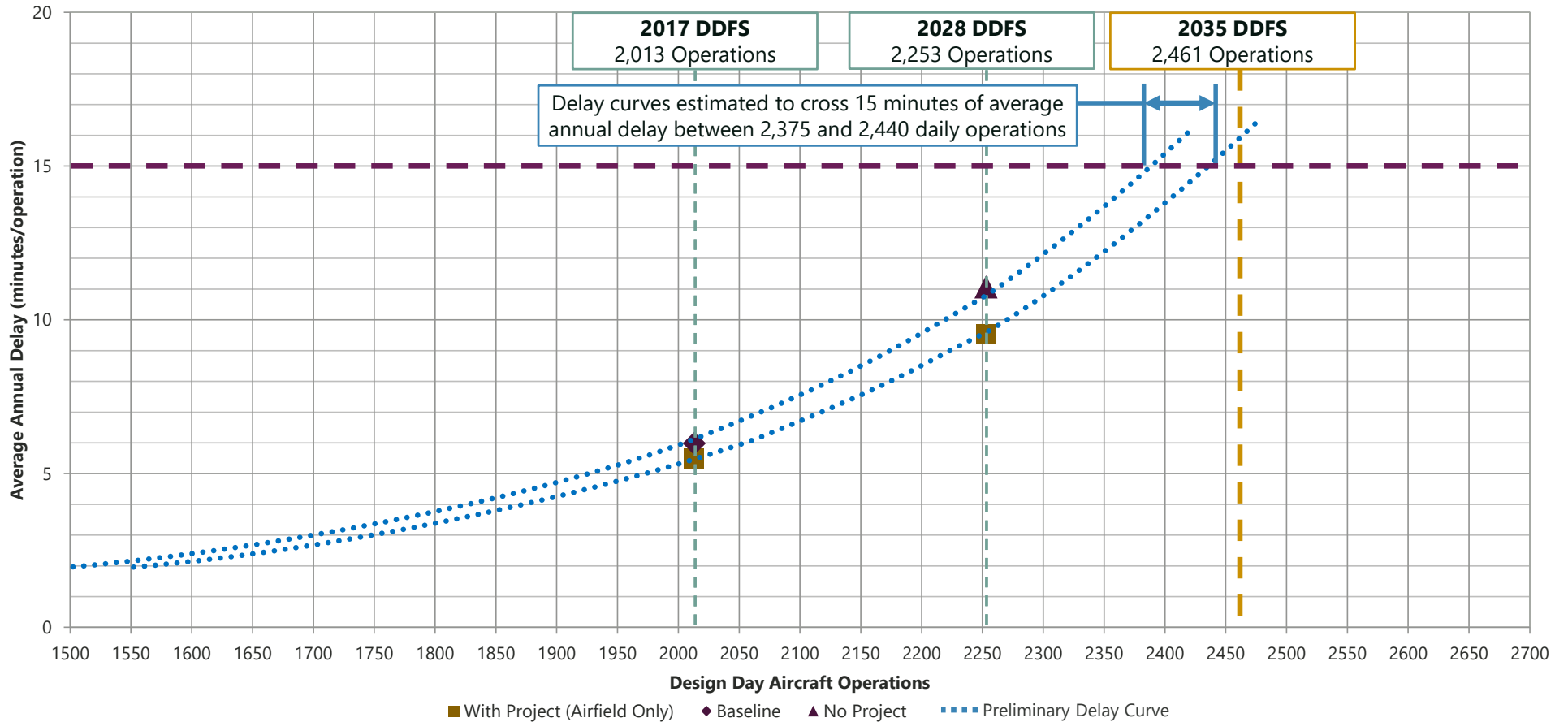
NOTE: All models used for the Terminal 9 sensitivity tests do not include gate reconfiguration at Terminals 5 and 6.  
 SOURCE: SIMMOD output, May 2018.

# Simulation Delay Summary



SOURCES: Simmod output, October 2017 (preliminary delay curve shape); Simmod Output, May 2018 (Baseline, No Project, and With Project delay)

# Simulation Delay Curve Estimate - Post 2028



SOURCES: Simmod output, October 2017 (preliminary delay curve shape); Simmod Output, May 2018 (Baseline, No Project, and With Project delay)



## Leading into Demand Management

- FAA does not have a threshold of delay to declare an airport an IATA Level 2 or Level 3 congestion airport
  - Level 1: Non-coordinated/non-facilitated (capacity is sufficient to meet demand)
  - Level 2: Facilitated (demand is approaching one or more capacity constraints)
  - Level 3: Coordinated/Slot Controls (demand regularly exceeds capacity)
- FAA evaluates an airport based on its unique conditions
- An airport, airline(s) or FAA can request Level 2 or Level 3 designation

NOTE: 1/ 82 FR 45938 - Notice of Submission Deadline for Schedule Information for Chicago O'Hare International Airport, John F. Kennedy International Airport, Los Angeles International Airport, Newark Liberty International Airport, and San Francisco International Airport for the Summer 2018 Scheduling Season.

# Case Study: FAA Declares LAX as Level 2

- March 6, 2015: FAA announced the designation of LAX as a Level 2 airport under IATA WSG effective June 28, 2015 due to capacity constraints caused by runway construction between 2015 and 2018.
- FAA evaluated the potential delay due to runway closures using historical demand levels:

FAA Analysis: Delay for Demand Period between 6:00 a.m. and 11:59 p.m. <sup>1/</sup>

| Runway 25L Closure                            | Arrival Delay | Departure Delay |
|---|---------------|-----------------|
| March 2015 Demand-March Historic Capacity     | 4.9           | 4.7             |
| March 2015 Demand-March Construction Capacity | 12.7          | 26.3            |

– Described as “moderate delays” by FAA <sup>2/</sup>

| Runway 24R Closure  | Arrival Delay | Departure Delay |
|---|---------------|-----------------|
| July/August 2015 Demand-July Historic Capacity                  | 9.6           | 14.8            |
| July/August 2015 Demand-August Historic Capacity                | 3.6           | 7.8             |
| Simulated Sept/Oct 2015 Demand-September Historic Capacity      | 2.4           | 4.7             |
| Simulated Sept/Oct 2015 Demand-October Historic Capacity        | 2.0           | 5.2             |
| July/August 2015 Demand-July Construction Capacity              | 30.2          | 83.7            |
| July/August 2015 Demand-August Construction Capacity            | 29.8          | 83.6            |
| Simulated Sept/Oct 2015 Demand -September Construction Capacity | 4.7           | 27.3            |
| Simulated Sept/Oct 2015 Demand-October Construction Capacity    | 4.9           | 27.1            |

Described as “more extensive delays” by FAA <sup>2/</sup>

Source: 1/ Federal Aviation Administration, Air Traffic Organization System Operations Services. “LAX IATA Level 2 Facilitation and Slot Administration Considerations” (presentation, April 1, 2015); 2/ 80 FR 12253 – Notice of Submission Deadline for Schedule Information for Los Angeles International Airport for the Summer 2015 Scheduling Season.

## Case Study: FAA Declares Newark International (EWR) Airport Level 2 from Level 3

- May 1, 2008 - FAA designated EWR as Level 3 and limited operations to 81 per hour
- April 4, 2016 – FAA designated EWR as Level 2 – Compared 2015 to 2007 peak conditions
  - **Scheduled demand** was routinely **below the 81 hourly scheduling limits** in the Order
  - Model Results:
    - Average **arrival delays decreased from 24.0 minutes to 16.3 minutes**, and **departure delays from 18.0 minutes to 14.2 minutes**
    - **Number of flights delayed greater than one hour are down from 94 to 41 for arrivals**, and **from 16 to 13 for departures**

## Airfield Demand/Capacity Findings

- Forecast growth in operations will increase delays
- NASIP airfield improvements provide operational efficiencies and reduces delays
- Concourse 0 independently provides operational efficiencies and reduces delays
- Terminal 9 independently provides operational efficiencies and reduces delays
- NASIP airfield and terminal improvements should allow airfield delays to remain tolerable (not require Level 3 facilitation) through 2033 to 2035 forecast timeframe
- Confirmation of proposed thresholds of tolerable delay for LAX require a third data point (delay curve) at or above 15 minutes of delay
- 15 minutes is a key consideration at identifying tolerable delays and additional analysis is needed to provide a more complete basis of defining the practicable airport capacity at LAX

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# Landside Roadway Concepts

CONFIDENTIAL DRAFT - FOR DELIBERATIVE PURPOSES ONLY

# Landside Roadway Concepts

- Separate PPT presentation prepared by Tony Skidmore

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# Concourse 0 and Terminal 9 Status

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## Concourse 0 and Terminal 9 - Topics for June 11<sup>th</sup> Meeting

- Purpose and Need
- Methodology for development of concepts
- LAWA goals and objectives for concept development
- Composite airport site overview
- Concourse 0 + Terminal 9 Concepts
  - Area of impact
  - Enabling projects
  - Airfield + Landside + APM coordination
  - Facility program
  - Floor plans
  - Blocking + Stacking
  - Primary flows
- Next Steps



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# Next Steps

## Next Steps

- Airside
  - Complete 2028 with Project (including combined C0 & T9) airfield capacity/delay assessment by June 15th
  - Complete 2035 with Project (including combined C0 & T9) airfield capacity/delay assessment by June 25th
- Gates
  - Finalize 2035 forecast with project gating analyses this week
- Terminals
  - June 11<sup>th</sup> Briefing to Steering Committee
- Landside
  - Follow-up on Comments/Input from Today's NASIP Steering Committee Meeting
  - Provide Similar Briefing to Southwest and United Airlines (June 20<sup>th</sup>??) and Receive Feedback
  - Integrate Preferred Landside Access Concept into T9 Concept Planning

# EXHIBIT

# 8



*Los Angeles  
World Airports*

# **FAA BRIEFING**

**AUGUST 29, 2018**

## **NORTH AIRFIELD SAFETY IMPROVEMENT PROJECT**

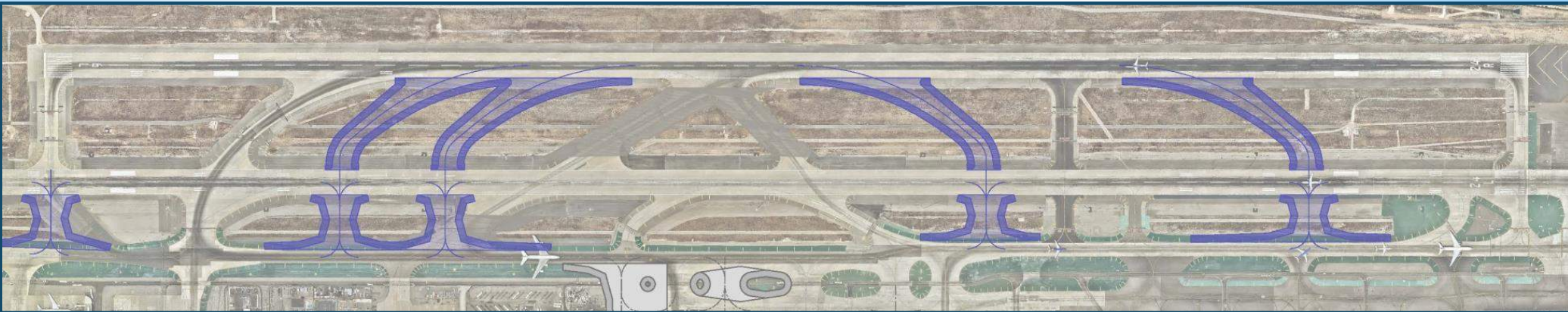
# NASIP Planning Work to Date

- General Project Description
- Defined objectives for the project
- Identified enabling projects and areas of impact
- Formulated Facility requirements
- Refined concept-level detail for building functions, layout, footprint
  - Site plan; landside, apron configuration and facility footprint(s)
  - Operational parameters for airside and landside connectivity
  - Fundamental space program and critical adjacencies
  - Blocking and stacking; building volumes
- Construction feasibility and phasing – in progress
- ROM cost estimate – in progress

# **NORTH RUNWAY AND TAXIWAY D IMPROVEMENTS RECOMMENDED CONCEPT**

# Runway 6L-24R Exits

## Preferred Concept

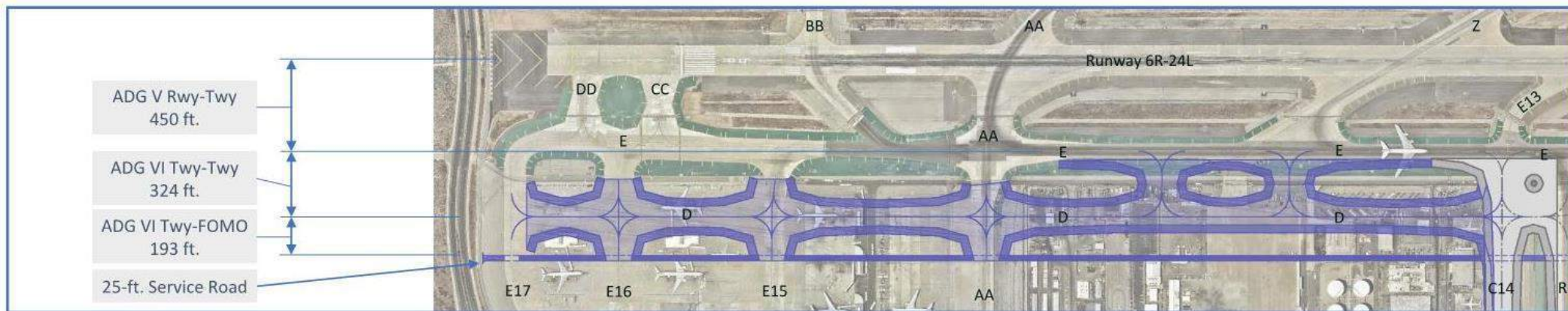


### Concept Components

- Remove or decommission Taxiways Z and Y
- Install two new acute angled exits for West Flow and two for East Flow
  - West Flow exits located east of Taxiway AA
  - East Flow exits located east and west of Taxiway W
- Plan per FAA Conditionally Approved ALP (June 6, 2018)

# Taxiway Improvements – West Preferred Concept

*FAA Conditionally Approved ALP (June 6, 2018)*



## Concept Components

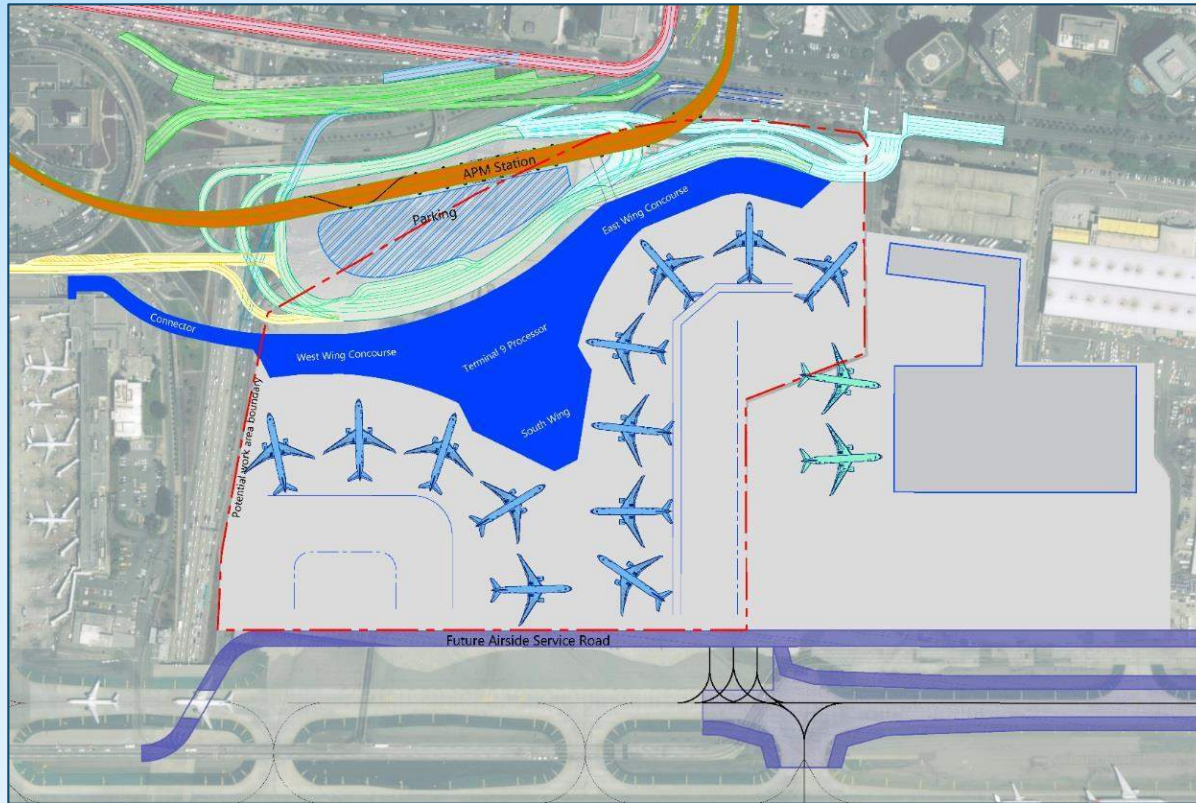
- Extend Taxiway D from Taxiway C14 to Taxiway E17 at ADG VI separation
- Relocate service road south of Taxiway D extension

*Impacts several facilities including Remote Gates*



# **TERMINAL 9 – TERMINAL CONCEPT**

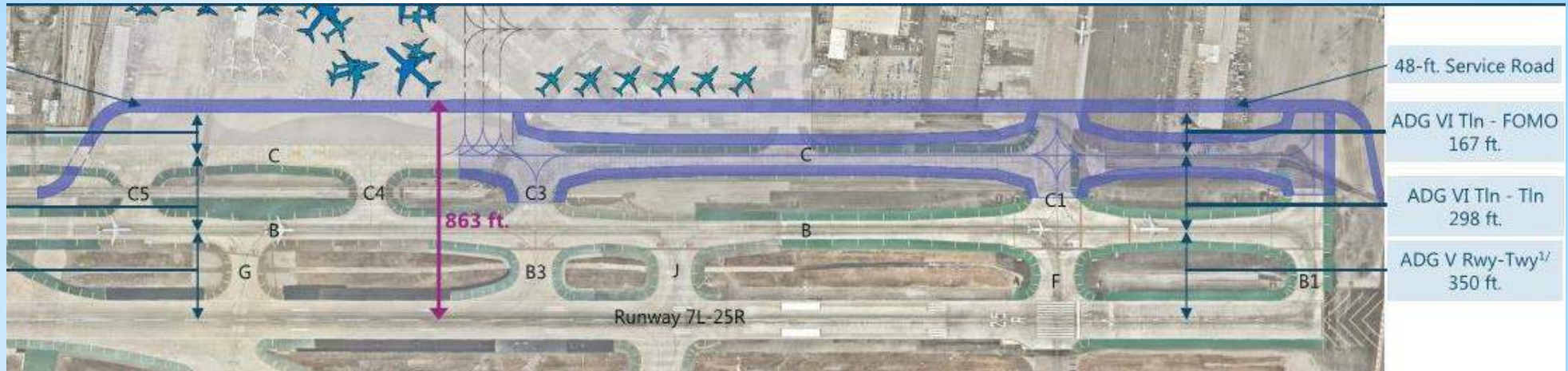
# Terminal 9 – LAWA Current Concept



- 12 WB gates
- 1.15 million square feet of floor area
- 4 levels (Ticketing, Concourse, Apron and Arrivals)
- Pedestrian bridge to CTA
- Potential for direct connection (tunnel) to APM station

# TERMINAL 9 - AIRSIDE ACCESS CONCEPT

# Preferred Taxiway Concepts (Terminal 9)



## Taxiway/Taxilane C

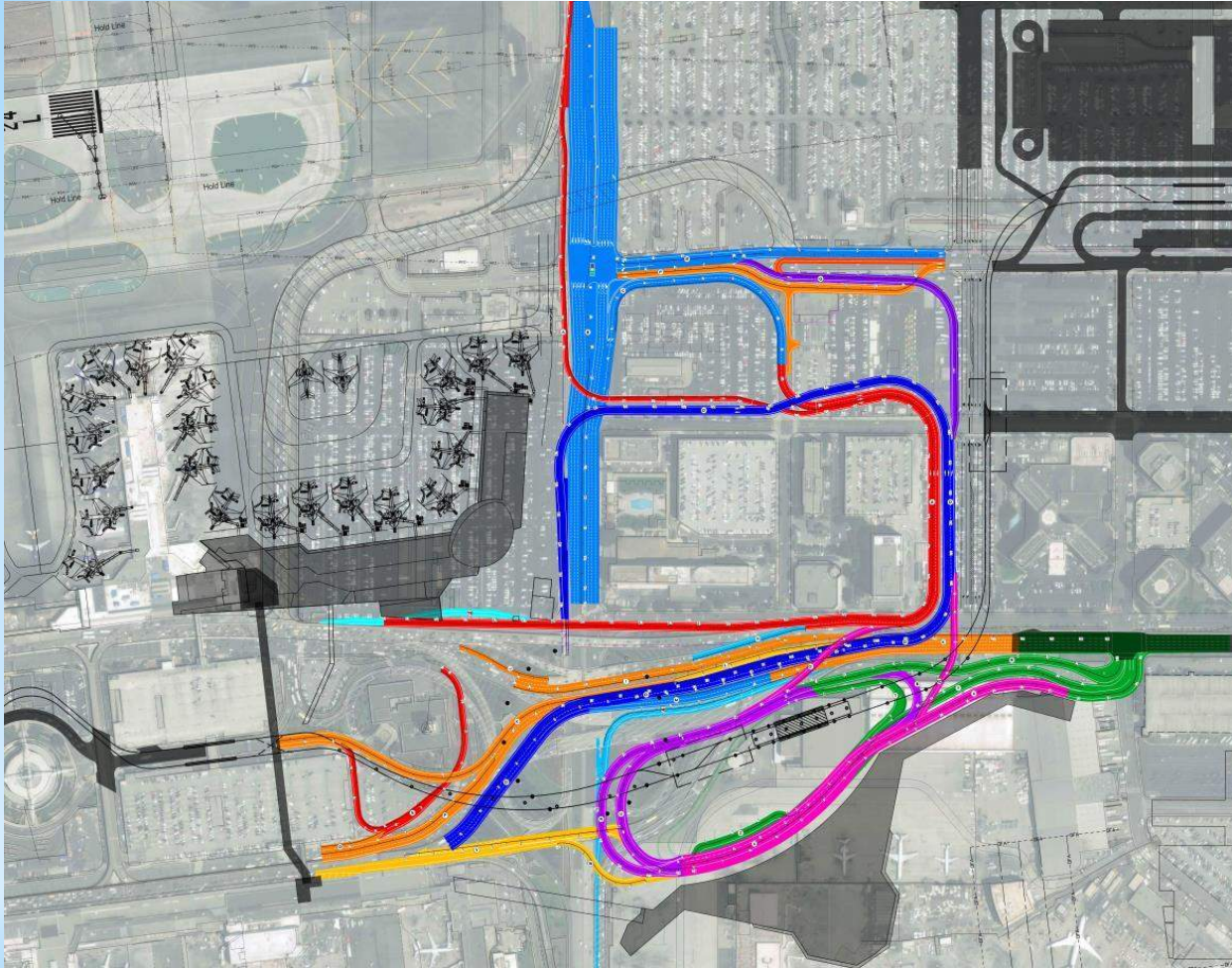
- Utilize existing 298-foot separation between Taxiways C3 and C5
- Extend Taxiway C east of Taxiway C3 at 298-foot separation to Taxiway B1
- Enlarges area where ADG VI operations do not impact operations on taxiways or runways
- May require MOS to use taxilane criteria on movement area
- May require MOS for non-standard taxiway width

## Service Road

- Extend service road relocation east to Taxiway B1
- May require MOS to use taxilane criteria on movement area

# **LANDSIDE ACCESS CONCEPT**

# Consolidated Entrance Concept Specific to T9

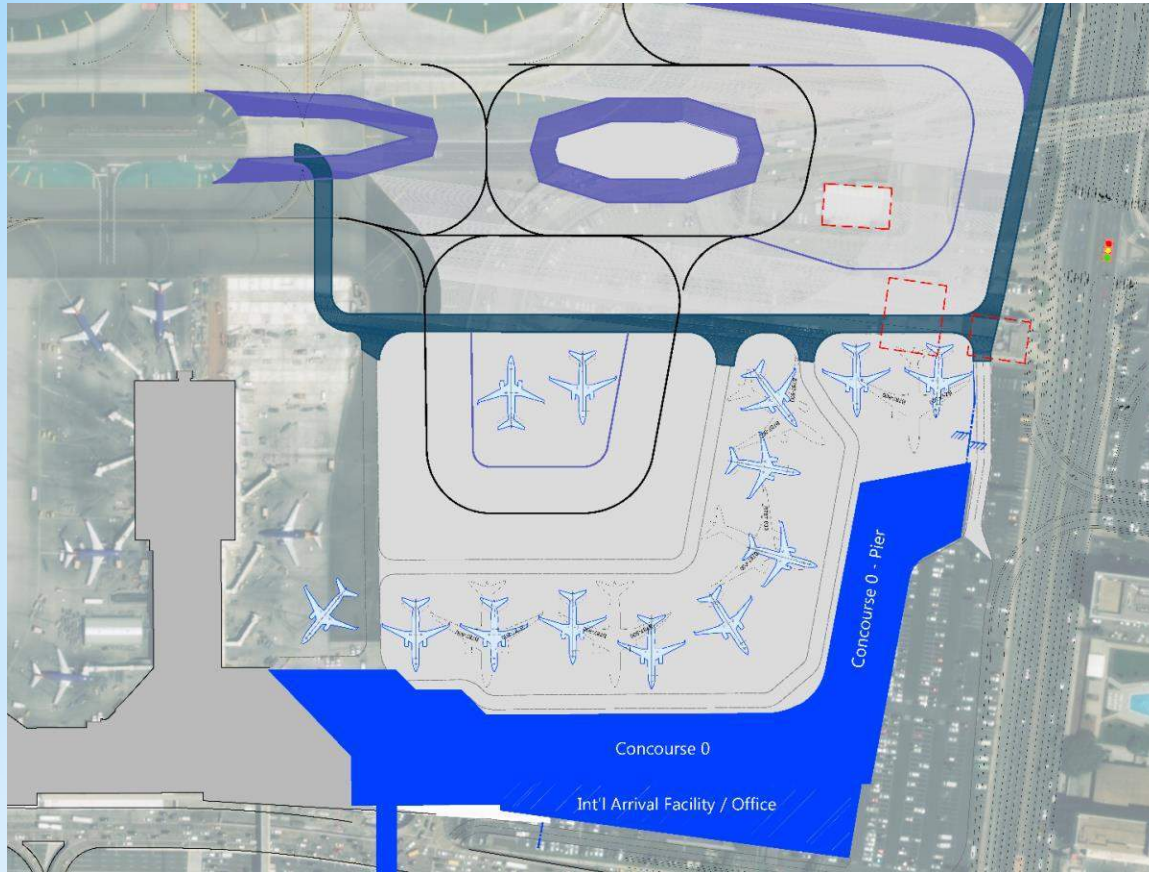


- Build upon the goals of current LAMP concept, especially relative access to ITF-W and APM
- Integrate T9 within the Airport's overall access and circulation goals
- Shift CTA entrance to east of Sepulveda
- Provide two primary points of access
  - 96th/98th Streets
  - Century Blvd
- Lengthen wayfinding experience
- Provide a consolidated return-to-terminal ramp that accommodates all terminals
- Eliminate direct access between CTA and Sepulveda Blvd

- ✦ NASIP planning and environmental analysis will evaluate option of providing direct access to Terminal 9 via ramps from Northbound Sepulveda

# CONCOURSE 0 – CONCOURSE CONCEPT

# Concourse 0 – LAWA Current Concept



- 11NB / 5 WB gates
- 744,729 square feet of floor area
- 4 levels (Mezzanine, Concourse, Apron and Arrivals)
- Extension of T1 processor



# CONCOURSE 0 - AIRSIDE ACCESS CONCEPT

# With Project - Preferred Taxiway Concepts (Concourse 0)



## Taxiway E / Taxilane D

- Utilize ADG V separation between Taxiway E and Taxilane D

## Service Road

- Relocate 2-lane service road to 138 feet (ADG V taxilane FOMO) south of Taxilane D north of Concourse 0

## Non-Movement Area

- Utilize pavement area east of new ADG V taxilane for Concourse 0 ADG III pushbacks and penalty box

# AIRFIELD MODELING

# Airfield Demand/Capacity Analysis

## ✦ 2017 Baseline Completed

- Assumes existing airfield with Taxiway C14 and MSC-N

## ✦ 2028 No Project Completed

- Assumes same airfield as 2017 Baseline

## ✦ 2017 and 2028 With Project (Airfield Only) Completed

- Includes runway 6L-24R Exit Improvements
- Includes westward Extension of Taxiway D

## ✦ 2028 With Project (Airfield and Terminal) Sensitivity Testing

- Concourse 0 and Terminal 9 analyzed independently (completed)
- Both independent scenarios show slight reduction in delay
- Concourse 0 and Terminal 9 combined are currently being evaluated

# Airfield Demand/Capacity Findings

- ✦ Forecast growth in operations will increase delays
- ✦ NASIP airfield improvements provide operational efficiencies and reduces delays
- ✦ Concourse 0 independently provides operational efficiencies and reduces delays
- ✦ Terminal 9 independently provides operational efficiencies and reduces delays
- ✦ NASIP airfield and terminal improvements should allow airfield delays to remain manageable through 2033 to 2035 forecast timeframe
- ✦ 15 minutes is a key consideration at identifying tolerable delays and additional analysis is needed to provide a more complete basis of defining the practicable airport capacity at LAX

# NEXT STEPS

# Next Steps

- **Combined Elements (Airside-Landside-Terminals Combined)**
  - Complete ROM cost estimates
  - Complete constructability analysis including development of phasing framework
  - Prepare NASIP Concept Report as basis for Project Description
- **Prepare for, and engage, environmental review processes**
- **Evaluate Clean Air Act (CAA) Conformity Strategy Options**

# Lead-Up to Environmental Process

**ATMP-AL010**

**NEPA**

**Identify Proposed Action  
(August 2018)**

**Identify Project  
Objectives & Purpose  
and Need  
(Sept/Oct 2018)**

**Draft AQ Protocol &  
Identify Alternatives  
(December 2018)**

**Initiate Scoping  
(February 2019)**

**CEQA**

- **Develop & Publish  
Initial Study/Notice  
of Preparation  
(Sept 2018-Jan 2019)**

**Combined Concept**

- **Prepare Combined  
Concept**
- **ROM Cost Estimates  
and Draft  
Constructability  
Analysis**
- **SIMMOD**
- **Preliminary AQ  
Conformity  
Evaluation**
- **Draft NASIP Concept  
Report  
(August 2018)**

**Airfield  
Landside  
Terminals**

- **Individual  
Concept  
Refinements**
- **ROM Cost  
Estimates**
- **Simulation  
(June/July 2018)**



# Operational and Safety Assessment (OSA)

| OSA   | INFO NEEDED PRIOR TO COORDINATION                                  | COORDINATION ACTION REQUESTED             |
|---|--|---|
| <p>OSA will be a planning-level evaluation workshop; is not a Safety Risk Management Panel (SRMP)</p> <p>Purpose is to assess whether there are any notable operational and/or safety concerns related to proposed NASIP airfield improvements</p> <p>Participants to include LAWA, FAA, and UA/SWA Chief Pilots</p> <p>Can provide recommendations for incorporation into future more detailed planning and design of airfield improvement</p> | <p>Identification of workshop participants, location, and date</p> | <p>Identification of FAA participants</p> |

September

TIMELINE - 2018

# Southern California Association of Governments (SCAG)

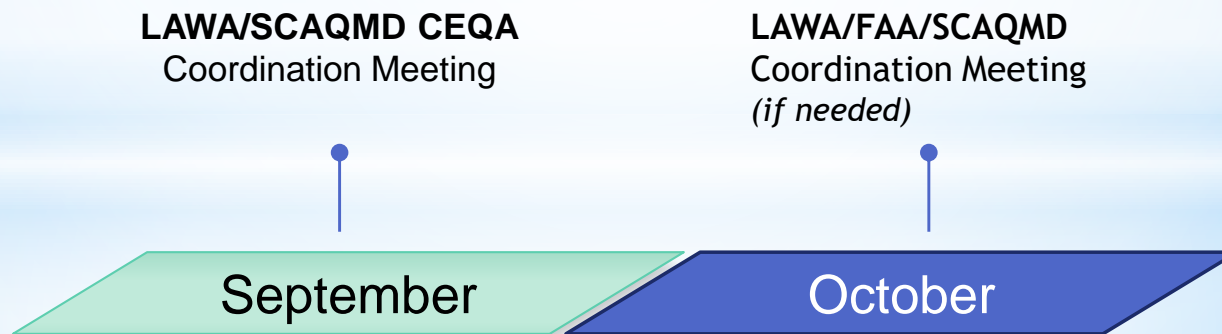
| AVIATION FORECAST   | INFO NEEDED PRIOR TO COORDINATION   | COORDINATION ACTION REQUESTED   |
|---|---|---|
| <p>Adopted Regional Transportation Plan (RTP) assumes up to 96.6 MAP for LAX.</p> <p>SCAG has indicated update to RTP may increase LAX MAP to 106 by 2026.</p> <p>Modeling underway</p> | <p>Main project elements and schedule (expected August 2018)</p> <p>Activity levels and analysis years for unconstrained and constrained (expected August 2018)</p> | <p>Coordinate Aviation Activity forecast to be included in 2045 RTP Update.</p> <p><i>NOTE: Aircraft operational emissions contained in the State Implementation Plan are based on the RTP forecasts.</i></p> |



TIMELINE - 2018

# Southern California Air Quality Management District (SCAQMD)

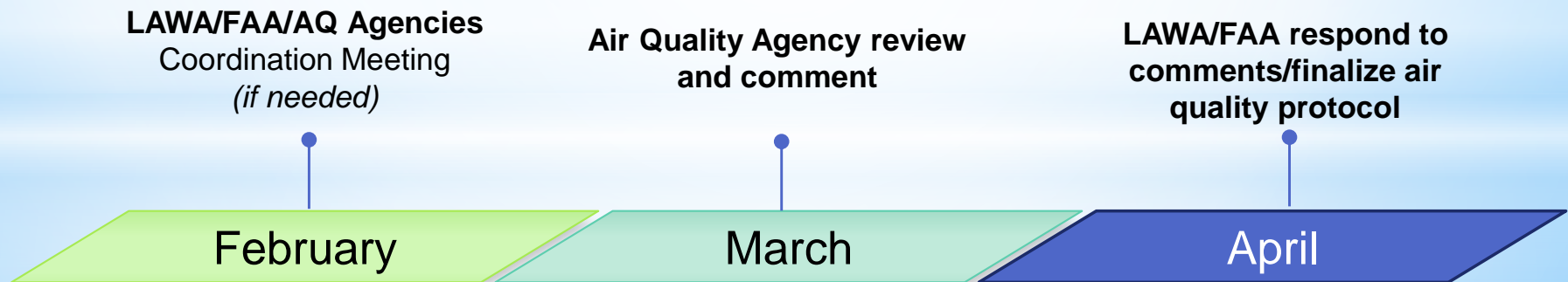
| AIR QUALITY CONFORMITY   | INFO NEEDED PRIOR TO COORDINATION   | COORDINATION ACTION REQUESTED   |
|--|---|---|
| Possible emission budget allocation to demonstrate conformity (construction and operations). | Main elements and schedule (estimated August 2018); activity levels and analysis years (estimated August 2018); preliminary construction estimates (Sept 2018) and approach for operational emissions (Sept 2018) | LAWA to introduce project and discuss AQMD modeling requirements for CEQA.<br>Coordinate with AQMD on emission budget allocation if needed. |



TIMELINE - 2018

# Air Quality Agencies

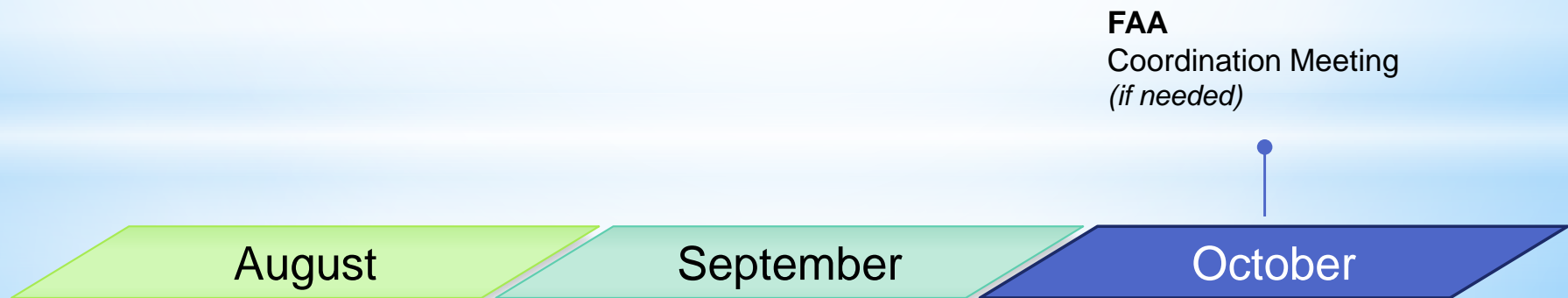
| AIR QUALITY PROTOCOL REVIEW                               | INFO NEEDED PRIOR TO COORDINATION   | COORDINATION ACTION REQUESTED   |
|---|---|---|
| Need Agency Review and Acceptance of Air Quality Protocol | Main elements and schedule (August 2018); activity levels and analysis years (August 2018); strategy to demonstrate air quality conformity (late Oct 2018); EPA input on conformity strategy (Nov. 2018-Jan 2019) | FAA to send out air quality protocol to air quality agencies for review and comment |



TIMELINE – 2019

# Cultural and Historic Resources

| ISSUE - SECTION 106 & NATIVE AMERICAN COORDINATION        | ACTION REQUESTED                                      |
|---|---|
| <b>NO ISSUES ANTICIPATED</b><br><br>Introduce the Project | No Impacts to Resources - Normal coordination process |



TIMELINE – 2018

# EXHIBIT 9



**Los Angeles long-term plan**  
**Network Planning**  
June 19, 2019

# Executive Summary

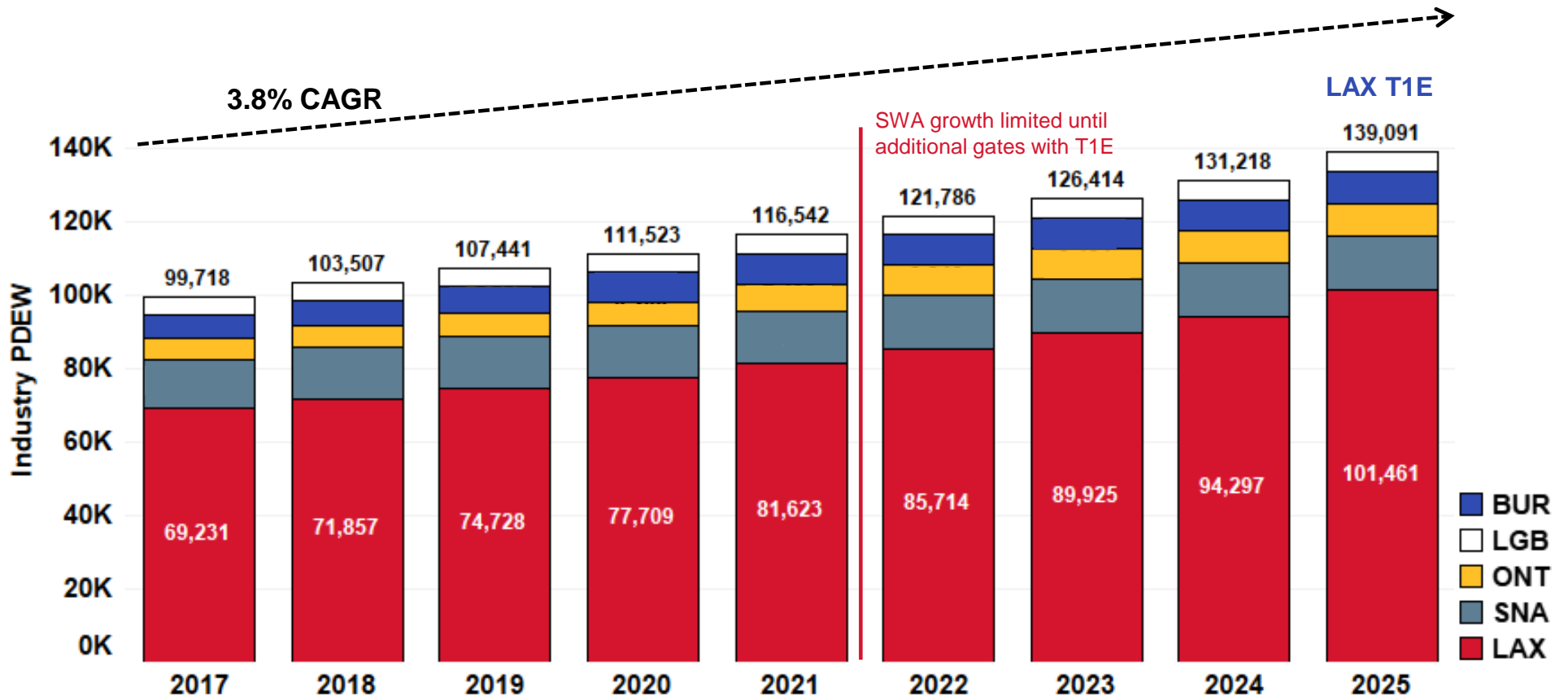
- Terminal One East (T1E) is required to grow the LA Basin area beyond 2021
  - Southwest is expecting a 3-5% growth rate in LA Basin area over the next 10-15 years
  - Much of the growth will be at LAX because of constraints at surrounding airports
    - BUR (facilities), LGB (slot), and SNA (enplanement cap)
  - The main sources of growth are long-haul flights, Hawaii, and new international routes
  - Future interline/codeshare ambitions would increase domestic feeder flights
- Additional gates would improve operational performance
  - Current gate utilization rate (10.9 turns/gate) is highest rate at LAX and higher than Southwest system average of 7.7 turns/gate<sup>1</sup>
  - Would bring gate utilization closer to SWA system goal of 8.5 turns/gate
  - As we increase the number of ETOPS flights, international flights, and 175-seat aircraft into LAX our aircraft will require more turn time at the gate for boarding/deplaning
- Planned growth at Midfield Satellite Concourse could occur in 2023 when a critical mass of flights justifies the additional cost and complexity in operations

1. Full year 2018 average daily turns per gate for Mega and Large stations (excluding LAX)



# LA Basin industry growth projection

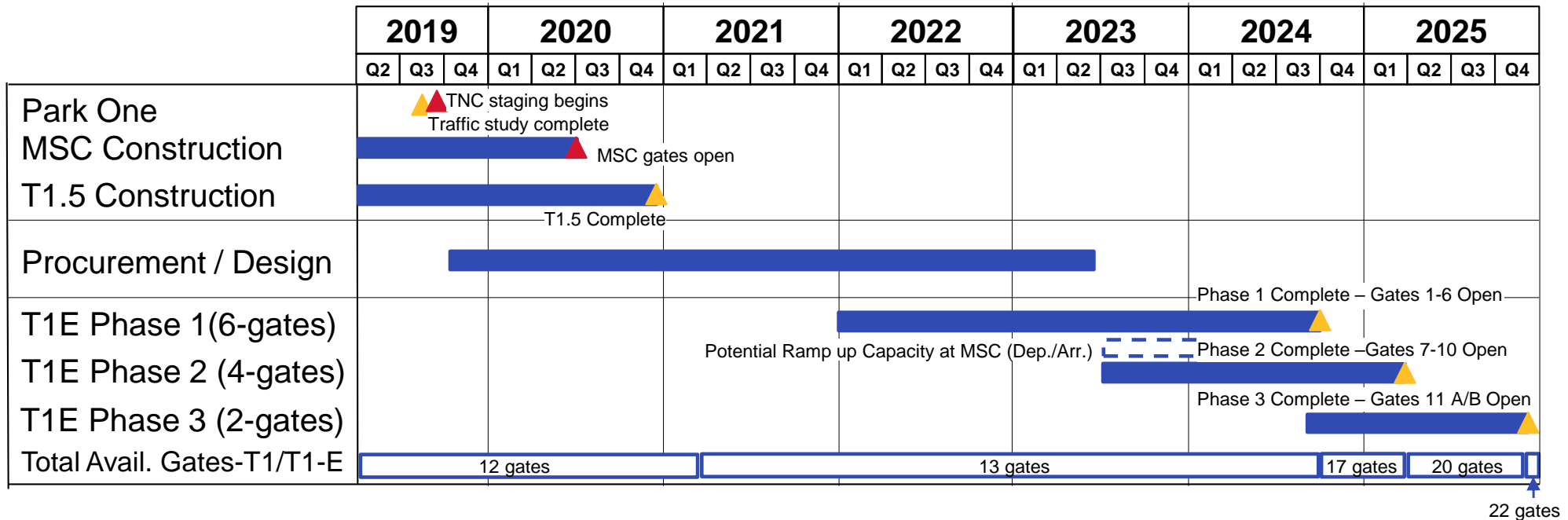
Economic and passenger indicators reflect a 3.8% 8-year CAGR



Sources: DIIO Mi LA Basin to all destinations and MSA GDP

# Draft of project timeline

Additional gates will facilitate future growth and ease of operations



➤ **Currently, Southwest runs both a higher gate utilization than other airlines at LAX and compared to our system average<sup>1</sup>**

1. Full year 2018 average daily turns per gate for Mega and Large stations (excluding LAX) of 7.7 turns/gate

# Midfield Satellite Concourse (MSC) considerations

## Near Term:

- When MSC comes online, our international arrivals will not be moved from TBIT to MSC
- No departures at MSC until a critical mass of flight activity
  - Requires use of own ground equipment
  - Distance from T1 will require significant additional staffing
  - Connectivity would be limited due to complexity
  - Customer experience considerations

## Mid Term:

- Potentially grow to small operations to MSC to ramp up flight activity before T1E
- Limited connecting passengers from MSC to T1E
- Build out all the support space (Managers Office, Breakroom)

# **EXHIBIT**

# **10**



# Southwest Airlines Terminal 1 East CDO & TDIP DED Briefing

January 15, 2020



# Agenda

1. Introductions
2. History
3. Building Programming
4. Other LAX Projects/Linkages
5. Preliminary Project Schedule & Phasing
6. Discussion and Questions

# T1E History: 2015 – Today

## T1E is Necessary for SWA to Grow Regionally

- Southwest is expecting 3-5% growth rate in LA Basin area over the next 10-15 years
- Much of the growth will be at LAX because of constraints at surrounding airports
  - BUR (facilities), LGB (slot), and SNA (enplanement cap)
- The main sources of growth are long-haul flights, Hawaii, and new international routes
- Future interline/codeshare ambitions would increase domestic feeder flights





# Recognized Five Years Ago & Recently Confirmed

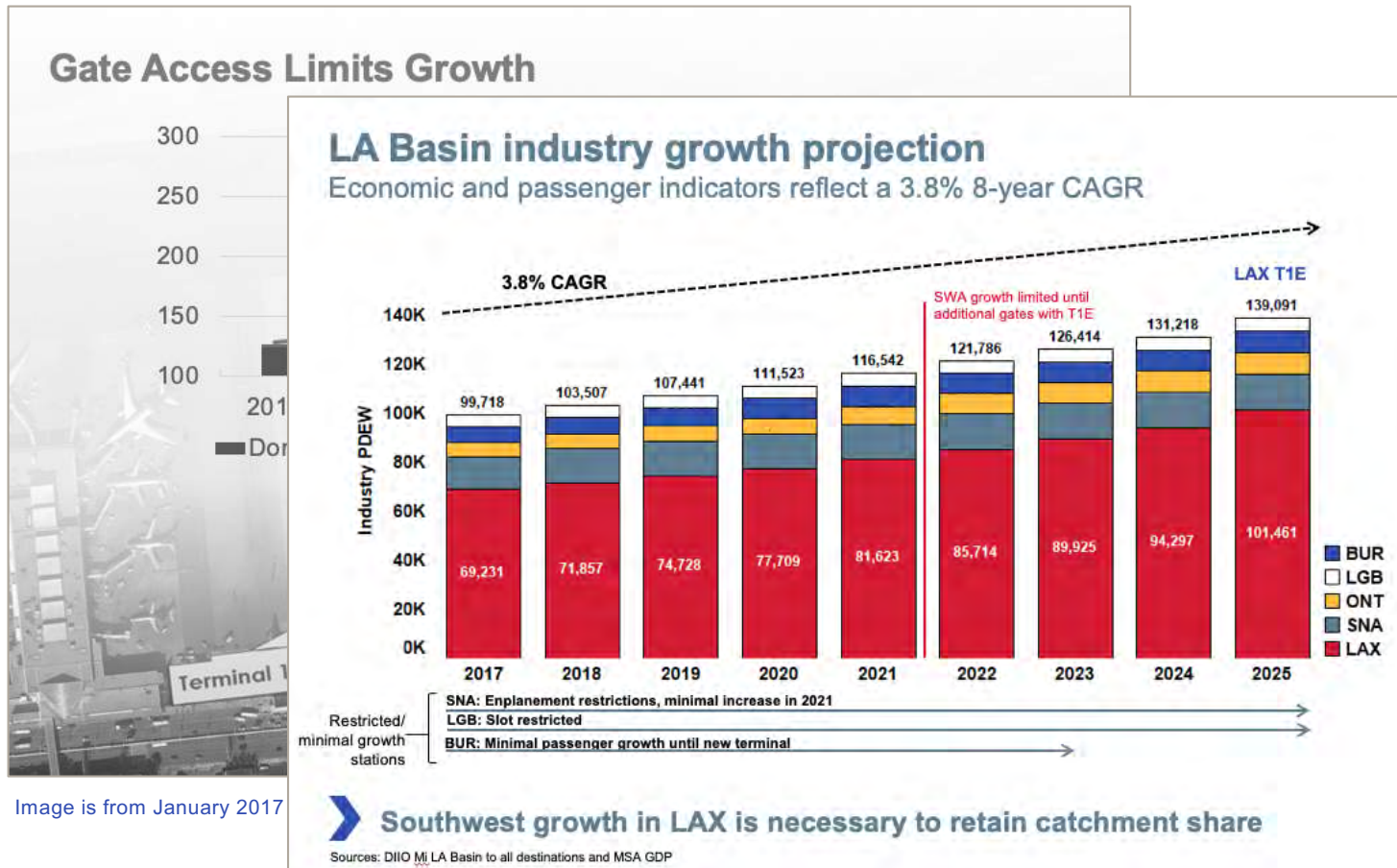
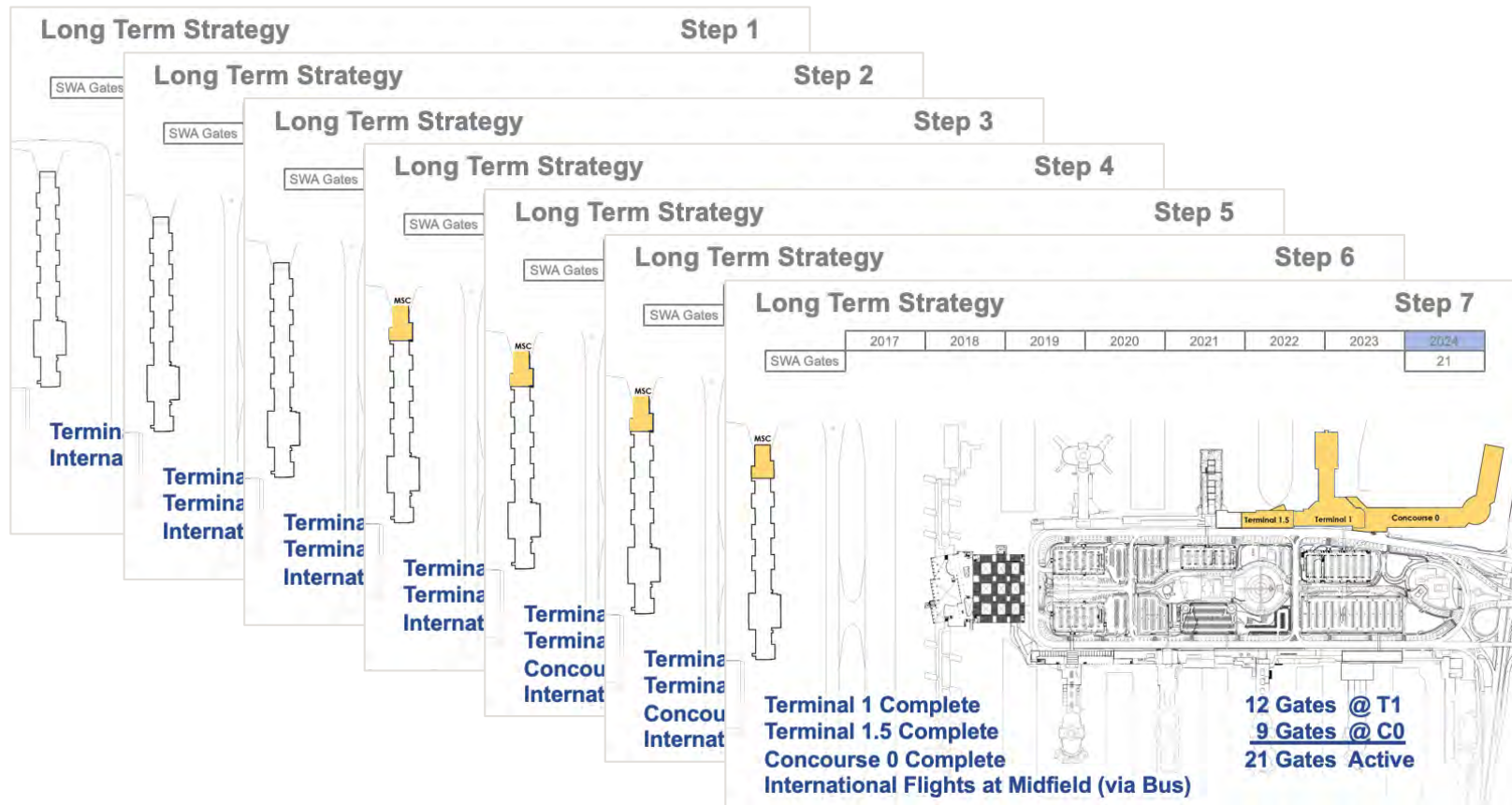


Image is from January 2017

Image is from June 2019 Network Planning Briefing to LAWA.

# Always Part of SWA's Long Term Strategy at LAX



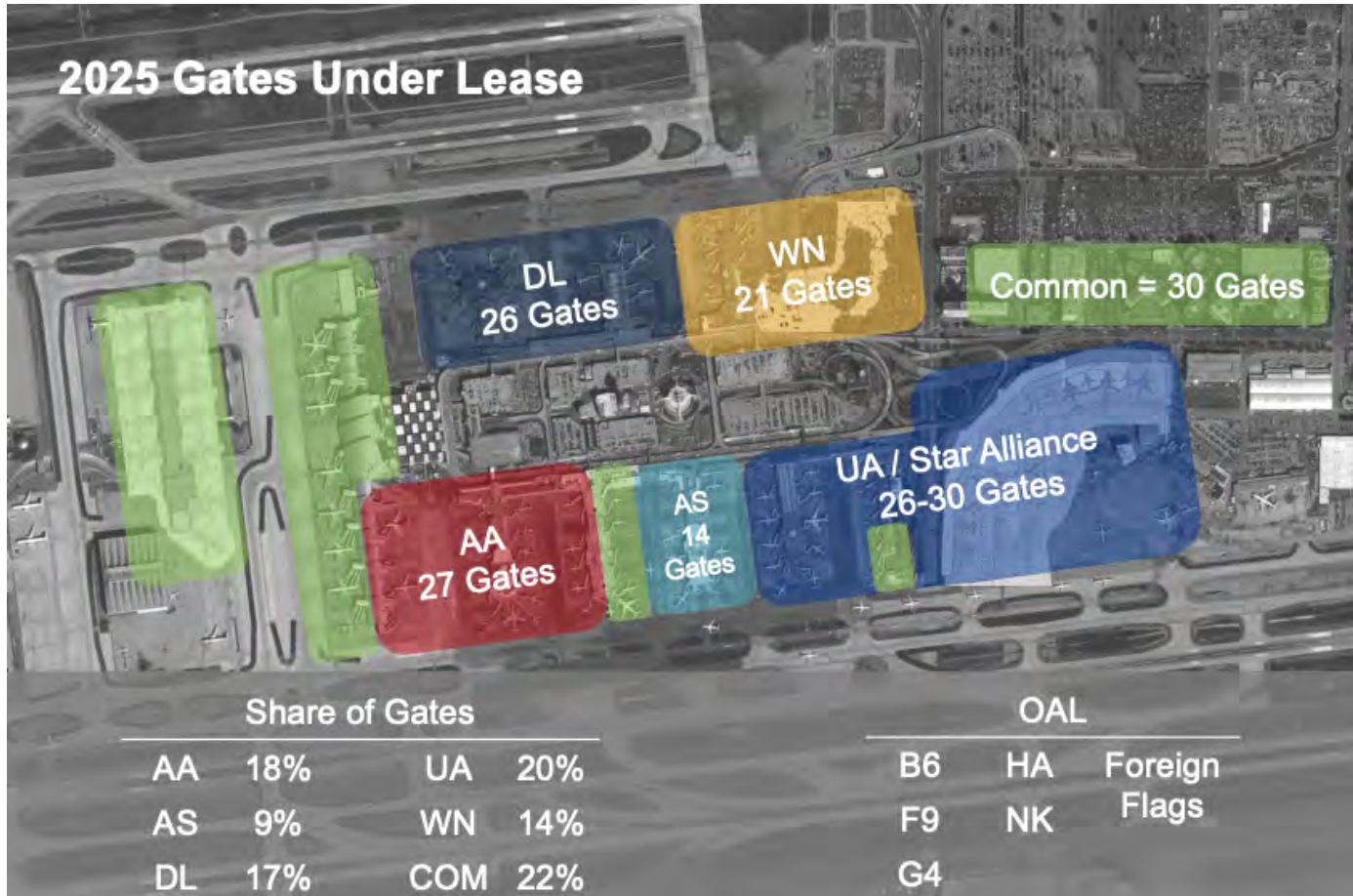
Images are from January 2017 Long Term Development Strategy Briefing to LAWA; actual gate count at conclusion of T1MP was 12 gates – not 11 as shown.

## Necessary to Optimize SWA Operations

- Current gate utilization rate (10.9 turns/gate) is highest rate at LAX and higher than Southwest system average of 7.7 turns/gate<sup>1</sup>
- Would bring gate utilization to >8.0 turns/gate
- As SWA increase the number of ETOPS flights, international flights, and 175-seat aircraft into LAX our aircraft will require more turn time at the gate for boarding/deplaning
  - Also planning for B737 MAX10 and potential code share partners

1. Full year 2018 average daily turns per gate for Mega and Large stations (excluding LAX)

## Further Airline Parity at LAX



Images are from January 2017 Long Term Development Strategy Briefing to LAWA.

## Already Completed Terminal 1 Modernization

- Award-winning remodel
- 12 gates accommodating B737-800W aircraft
- New departures lobby, including self-check and bag tag kiosks
- New domestic bag claim hall with two large bag claim carousels
- New consolidated 12-lane Security Screening Check Point (SSCP)
- Fully automated inline Checked Baggage Inspection System (CBIS)
- Enhanced concourse passenger experience with expanded gate lounge holdrooms
- New vibrant Food & Beverage and Retail Concessions
- Renovated and new public restrooms
- Other passenger amenities

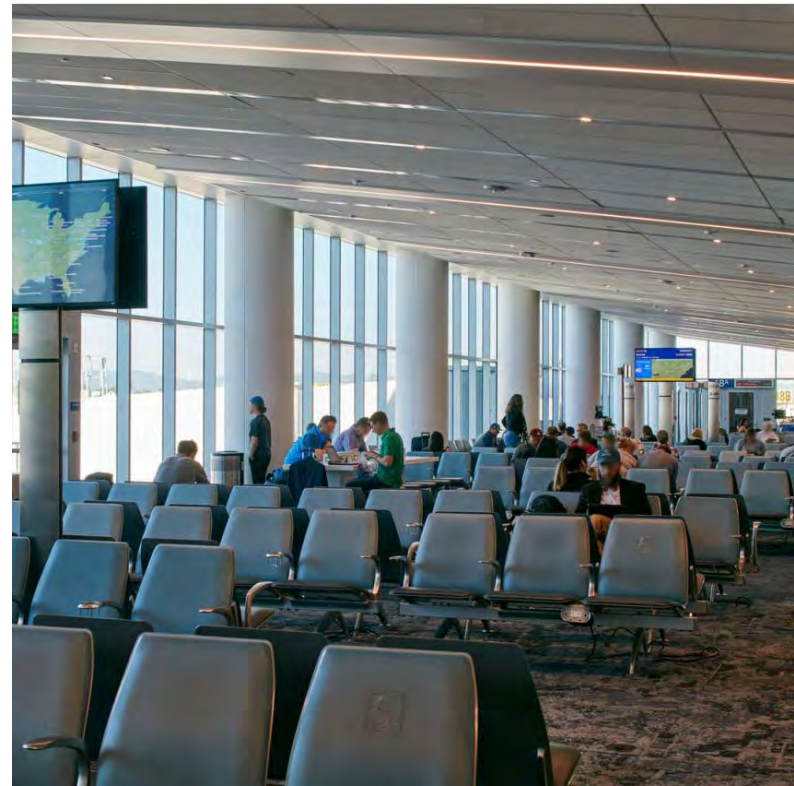
Completed: December 2018  
Approved Lease Agreement: \$515.8M  
Final Cost: \$514.7M

# Terminal 1



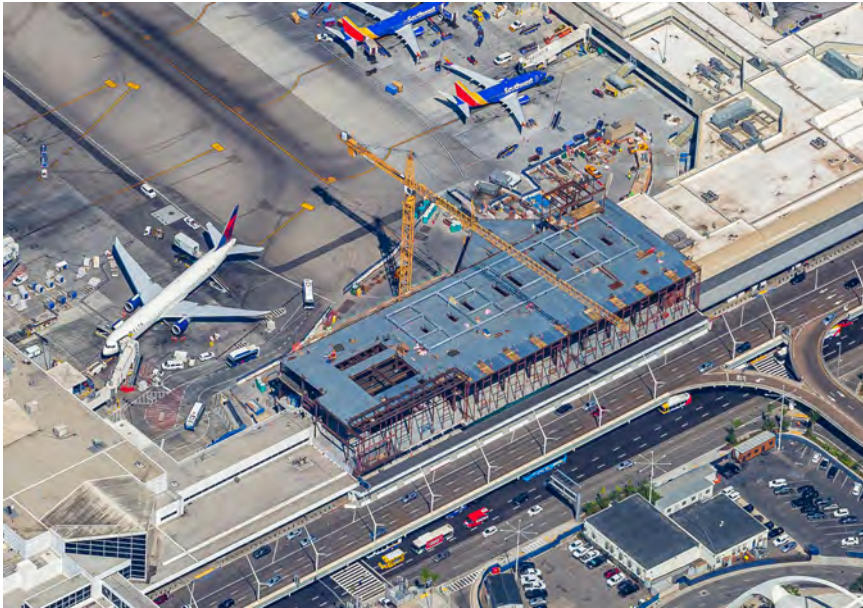
Photos: Dana Hoff Photography

# Terminal 1



Photos: Dana Hoff Photography

## Terminal 1.5 Currently Under Construction



- Currently under construction
- Full- and self-service check-in counters
- Additional domestic baggage claim facilities
- Bus Gate to allow transport of passengers between Terminals 1 and 1.5 and MSC
- Passenger bridge support and vertical circulation core connecting to the APM
- Airline office and support space for Southwest and other airlines

Lease Agreement Deadline: December 31, 2021  
Forecast Substantial Completion: December 2020  
Forecast Financial Closeout: May 2021  
Approved Lease Agreement: \$489.9M  
Current Trend: \$464.8M

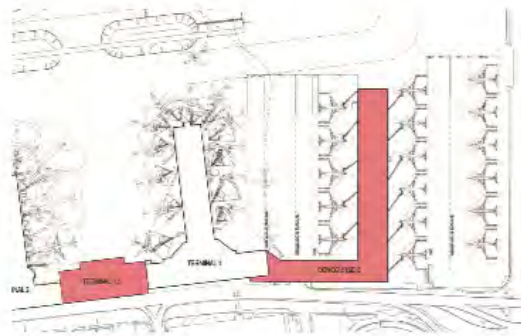


# Terminal 1 East Programming

## PDB Dates to 2016



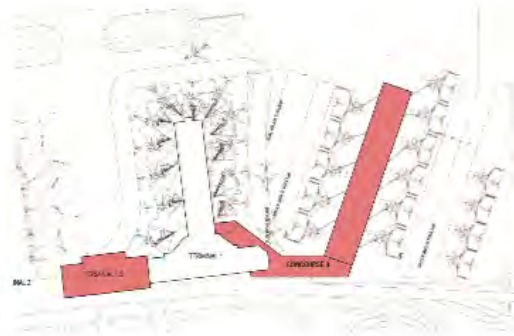
## Studied Variety of Configurations



### OPTION 1: DOUBLE-SIDED PERPENDICULAR PIER

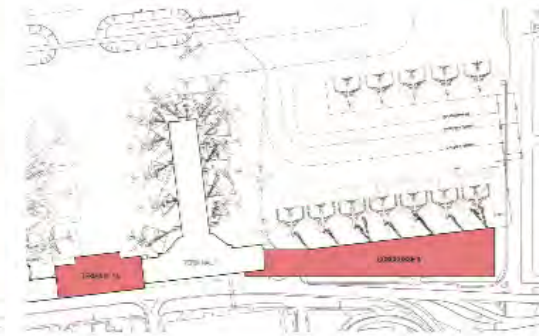
Option 1 could potentially result in an "L-Shaped" eleven ADG-III (B737-900) contact gates double loaded pier concourse. If the entire site were available for concourse development, it could also accommodate additional remote hardstands for 5 to 6 aircraft. The concourse could be developed with a dual ADG-III taxiway to the west between the Terminal 1 concourse and the new Concourse 0. A single ADG-III taxiway and remote hardstands could be created east of Concourse 0.

The advantages of Option 1 are that it could provide up to 11 contact gates on a relatively short and efficient double-sided concourse with reasonable passenger walking distances. It could also provide nearby remote gates.



### OPTION 2: DOUBLE-SIDED ANGLED PIER

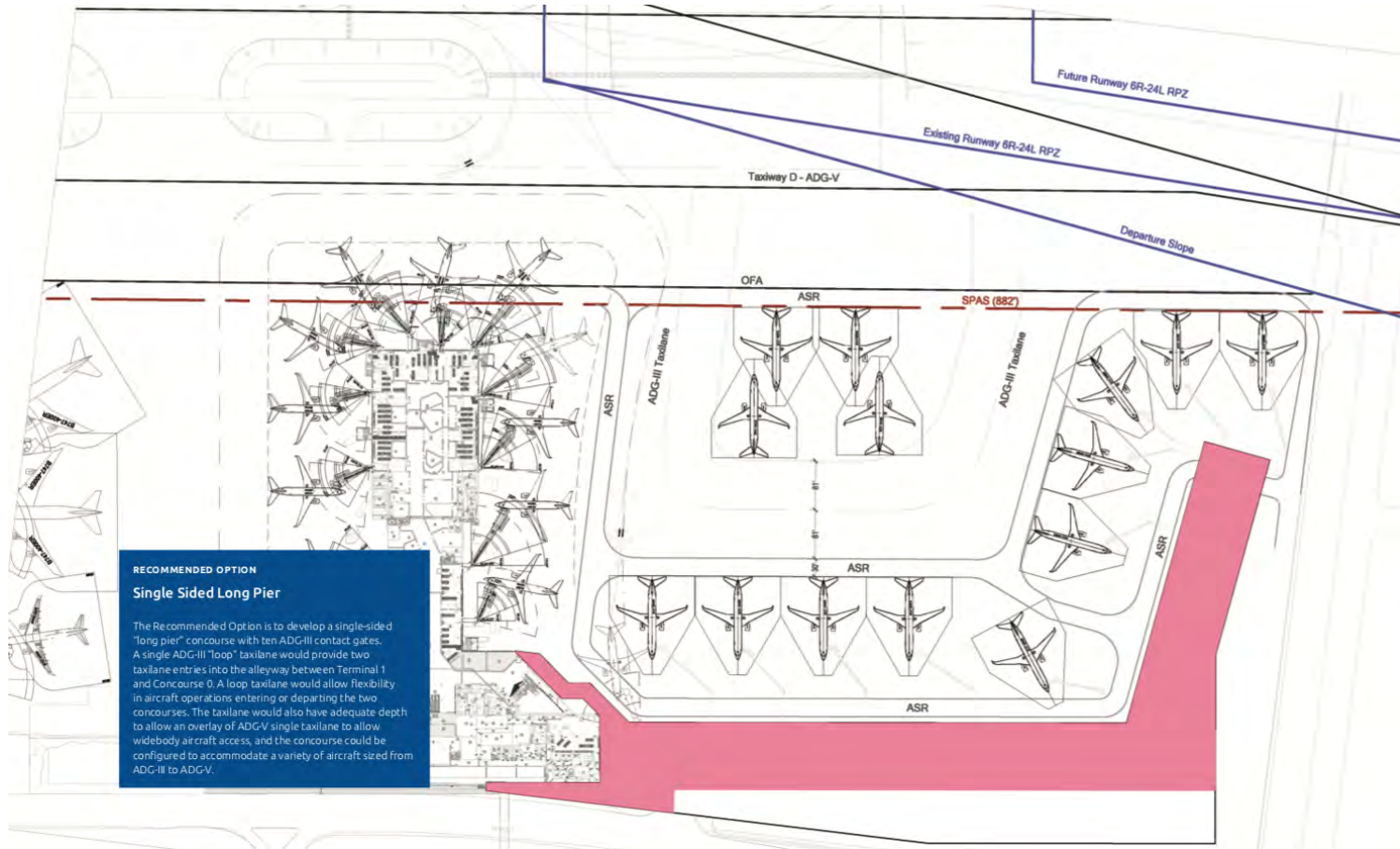
Option 2 could also potentially result in a double loaded pier concourse with eleven ADG-III contact gates, and some adjacent remote hardstand positions. By angling the concourse passenger walking distances could be comparable to Option 1. This option however, would create dual taxiways between Terminal 1 concourse and Concourse 0 that converge in the southern taxiway area, creating operational conflicts between arriving and departing aircraft. The east single taxiway would also have potential constraints at its north end due to the close proximity to Sepulveda Blvd.



### OPTION 3: SINGLE-SIDED "WEDGE" PIER

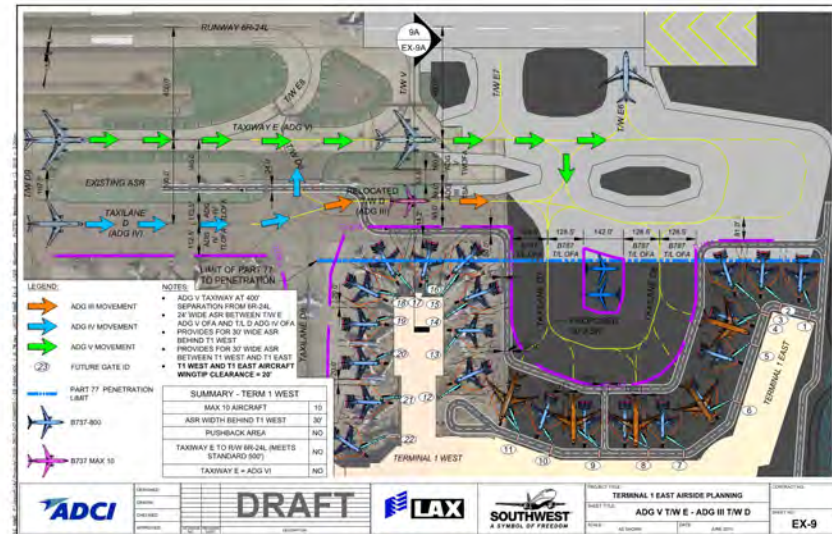
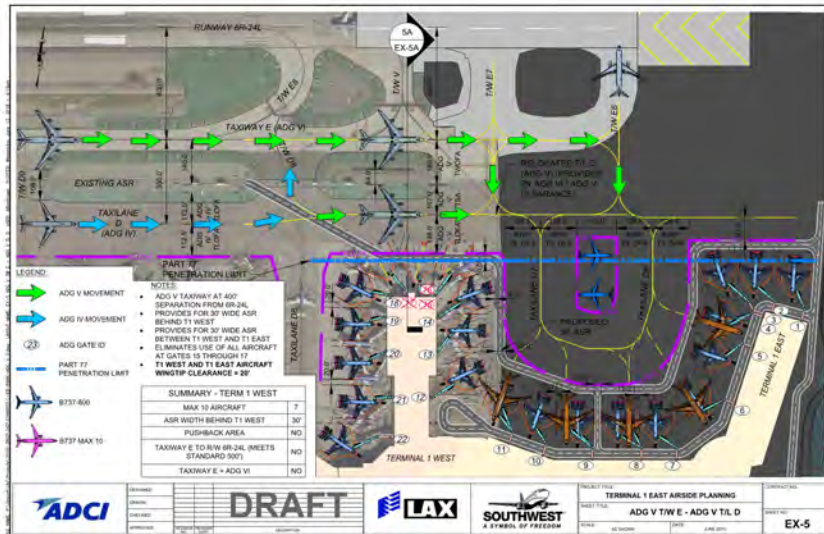
Option 3 could develop a single-sided "wedge-shaped" pier concourse along the south boundary of the site, with additional nearby remote hardstand positions to the north. That option would have potential to arrange a dual ADG-III taxiway alleyway that could also accommodate larger ADG-IV and V widebody aircraft, if that becomes necessary or desirable in the future. The principal advantage of Option 3 is that it could result in a relatively short compact concourse with flexibility for a variety of aircraft sizes to accommodate. It could also accommodate a new US Customs and Border Protection Federal Inspection Service (FIS) facility to process arriving international passengers. The principal disadvantage is that the concourse would have fewer ADG-III contact gates than either Options 1 or 2.

# Recommended Single-Sided Long Pier



# Studied Number of Airfield Layouts

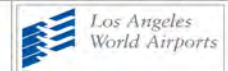
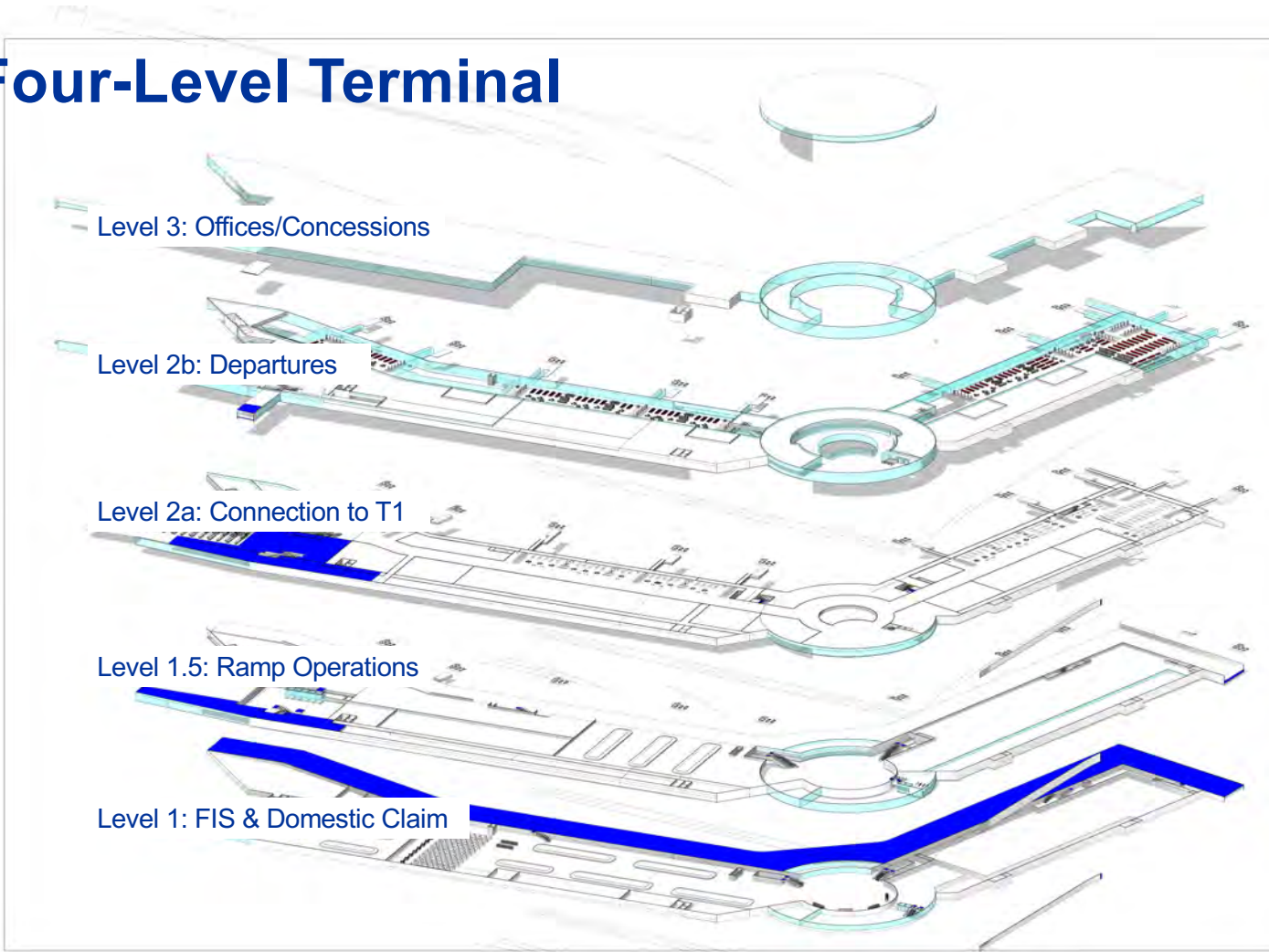
- From Dual ADG V, with significant, negative impacts to T1
- To Preferred ADG V / ADG III with a “penalty box”



## Program Value

- Southwest currently estimates program at ±\$2B
- Hard construction costs could exceed \$1.4B, including:
  - Significant utilities/enabling work beyond site boundary
  - 11-gate terminal (9 of which are new) and associated apron
  - Tie-in to Terminal 1
  - Terminal core providing connection and vertical circulation for APM
  - Passenger bridge from APM station to T1E core
  - Significant airfield improvements (Taxiway D & E)
- Soft costs potentially in excess of \$250M, include A/E, PM and testing/inspection

# Four-Level Terminal



5551 Ridgewood Drive St 300  
Naples, FL 34108  
P: 239.262.0010



4136 Del Rey Ave.  
Marina Del Rey, CA 90292  
2730 Idlewood Lane,  
Sacramento, CA 95821  
P: 415.656.6092

LAX  
TERMINAL 1 EAST  
Exploded Axon  
Plans

|                |            |
|----------------|------------|
| Project Number | T1E        |
| Date           | 01/21/2019 |
| Drawn By       | ME         |
| Checked By     | DG & KG    |
| Scale          | A11        |

1/23/2019 11:43:57 AM

## Space Summary

| Level                         | Function                                   | Approx. GFA    |
|-------------------------------|--|----------------|
| Level 1                       | Customs & Border Protection                | 161,250        |
|                               | Public Lobby, Domestic Bag Claim & Support | 101,740        |
|                               | Subtotal Level 1                           | 262,990        |
| Level 1.5                     | Ramp Ops-Baggage Handling                  | 55,550         |
|                               | Circulation, Loading Docks & MEP           | 47,980         |
|                               | Operations Offices                         | 79,910         |
|                               | Subtotal Level 1.5                         | 182,390        |
| Level 2                       | Security Screening Checkpoint Expansion    | 21,220         |
|                               | 10 Gate Holdrooms                          | 47,190         |
|                               | Concessions & Seating                      | 81,910         |
|                               | Public Restrooms & Support                 | 34,090         |
|                               | Sterile Corridor & Circulation             | 82,260         |
|                               | Subtotal Level 2                           | 266,670        |
| Level 3                       | Offices & Concessions                      | 46,540         |
|                               | MEP Rooms                                  | 13,570         |
|                               | Circulation                                | 24,780         |
|                               | Subtotal Level 3                           | 84,890         |
| <b>TOTAL GROSS FLOOR AREA</b> |  | <b>796,940</b> |

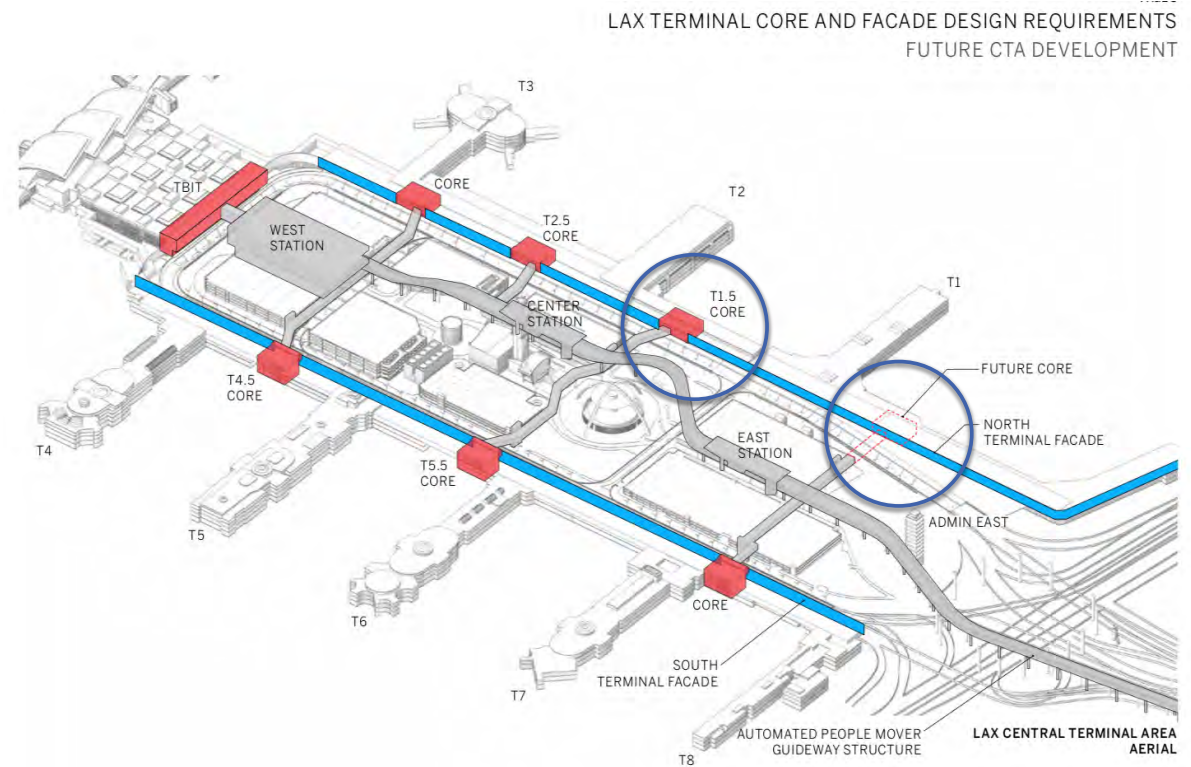


## SSCP, CBIS/CBRA, and BHS

- SSCP will largely be located in Terminal 1
  - T1 has 12 screening lanes
  - T1.5 adds 6 new lanes
  - T1E adds 4 more lanes and provides for passenger flows to the east into T1E
- CBIS/CBRA
  - Currently being expanded as part of T1.5 program
  - Sized to meet increased demand from T1E operations
- BHS
  - New outbound BHS and make-up in T1E

## APM Vertical Cores

- T1.5
  - West end of building
  - Will be first core completed on campus
- T1E
  - West end of building
  - Expectation is T1E program will construct bridge to station



## Other Scope

- Terminal 1.99 connector bridge
  - Removed from T1.5 program
- T1 façade
  - T1.5 and T1E will conform to LAWA design standards
  - Intended to blend appearance of T1.5, T1 and T1E



## Other Relevant Scope

- Provisioning Facility (23,000 sf)
  - Will be displaced by westerly extension of Twy D
- GSE Maintenance Facility (90,000-130,000 sf)
  - Potentially displaced by expansion of LAX Fuel facilities to maintain 3-day supply
- Cargo Facility (55,000-86,000 sf)
  - LAX East Cargo Facility project likely to affect facility when project resumes
- Additional West Coast Line Maintenance
  - With expanding operations in SoCal and NorCal, SWA expects to need additional line maintenance facilities
  - Not prepared to construct hangar facilities
  - But potentially interested in FedEx midfield facilities if timing is right

## Need to Re-examine T1E Programming

- PDB dates from 2016
- Expect to begin full design in April 2020
- First order of business: re-examine programming
  - Airfield and plane parking positions feel solid
  - Building is too big
  - Building may not align with expected operations
    - SWA has refined flight planning since 2016 DDFS
- Will consider ability to synergistically include other SWA needs at LAX

## LAWA Review of PDB

- Principles & Criteria date to April 2018
  - Need to revisit?
- Substantial comments on PDB, many of which remain open
  - Held workshops to address in late 2018 and early 2019
    - None since January 2019
- Further discussions should await re-examination of programming
  - But there are some important inputs needed for success of T1E



## Business Deal

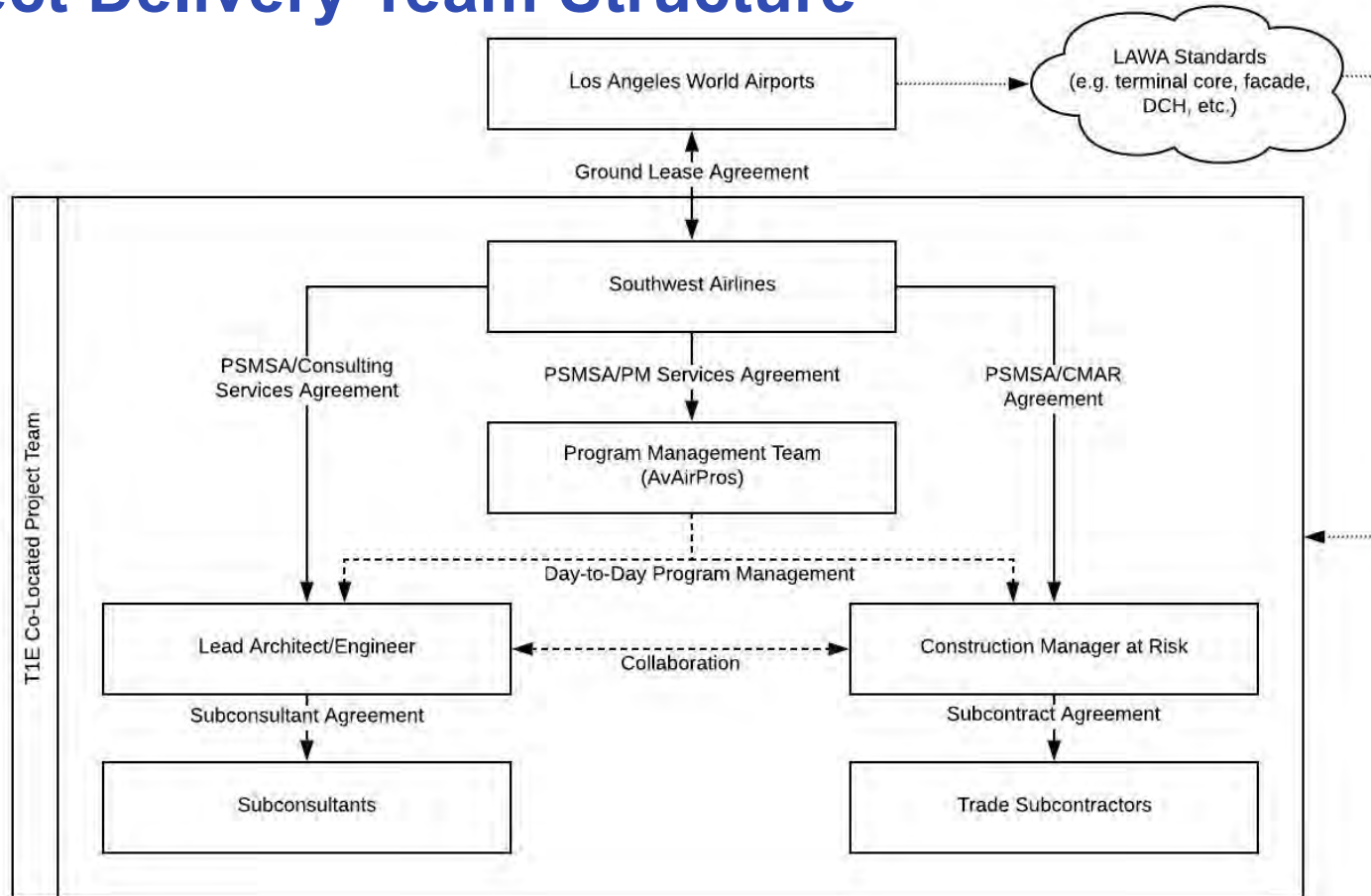
- Southwest does not yet have binding agreement for T1E development
  - Understands it is proceeding at risk
- Working on finalizing term sheet now
  - Approach is similar to other tenant projects
    - Ground lease with option of airport to purchase
  - Largest issue is earned rights for preferential operations
- Looking to have signed lease mid- to late-2020
- Prepared to finance the project through completion, in a single-phase if necessary

## Project Delivery

- SWA will utilize Construction Manager at Risk delivery methodology
- Just completed selection of CMR
  - Two-phase, best-value procurement
    - Statement of Qualifications, Proposal, Interview, and Price Factors (fee and rates)
  - Selected Hensel Phelps Construction Company
- In the middle of lead designer RFP process
  - Single-phase, best-value procurement
    - Proposal, Interview, and Price Factors (rates)
  - Expect to complete selection by end of January 2020
- NTP to team to begin by April 1, 2020



# Project Delivery Team Structure



# Other LAX Projects/Linkages

## Environmental Review

- T1E subject to environmental review as part of the Airfield & Terminal Modernization Project (ATMP)
- Expect ROD in December 2020
- Ability to proceed with project is directly tied to environmental review
- PMT has been working to coordinate with LAWA Environmental and CDM Smith on inputs to EIR
  - Phasing and logistics key to AQ



Los Angeles International Airport

**AIRFIELD & TERMINAL**  
MODERNIZATION PROJECT

### Notice of Preparation and Initial Study

April 4, 2019

Lead Agency:



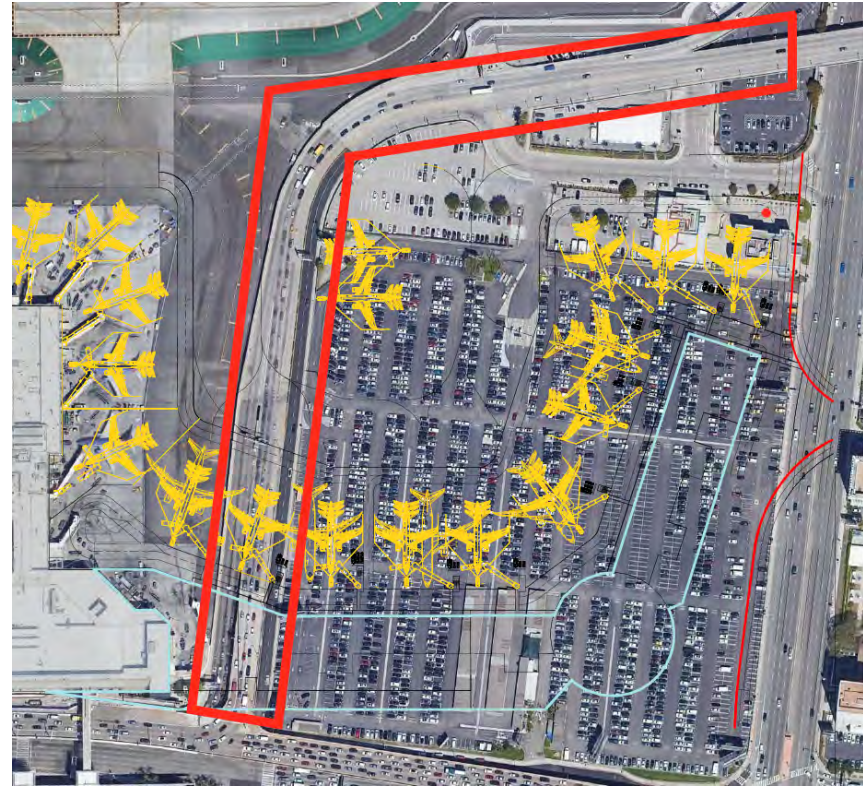
Los Angeles City File No. NP-19-001-AD

Prepared by:



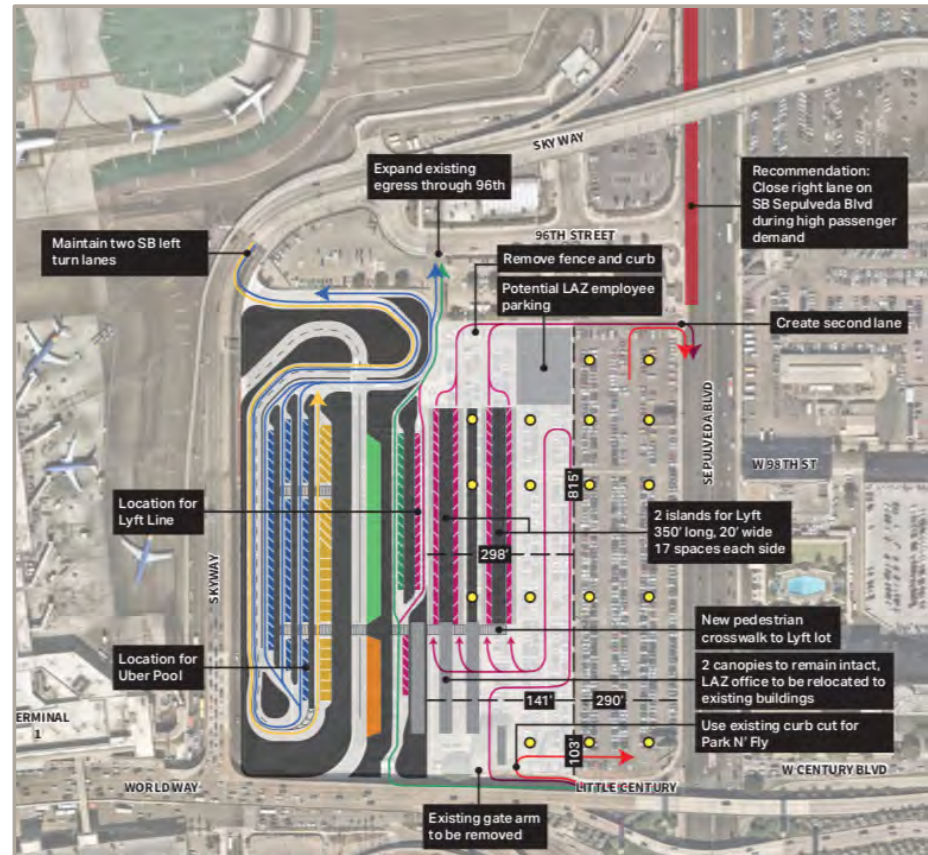
## Automated People Mover

- No direct interface, but Southwest's ability to demolish Sky Way is directly tied to the opening of the APM
- Delay to APM will affect schedule for and delivery of T1E
- Important that we receive updates on progress against plan to assess potential delays to T1E



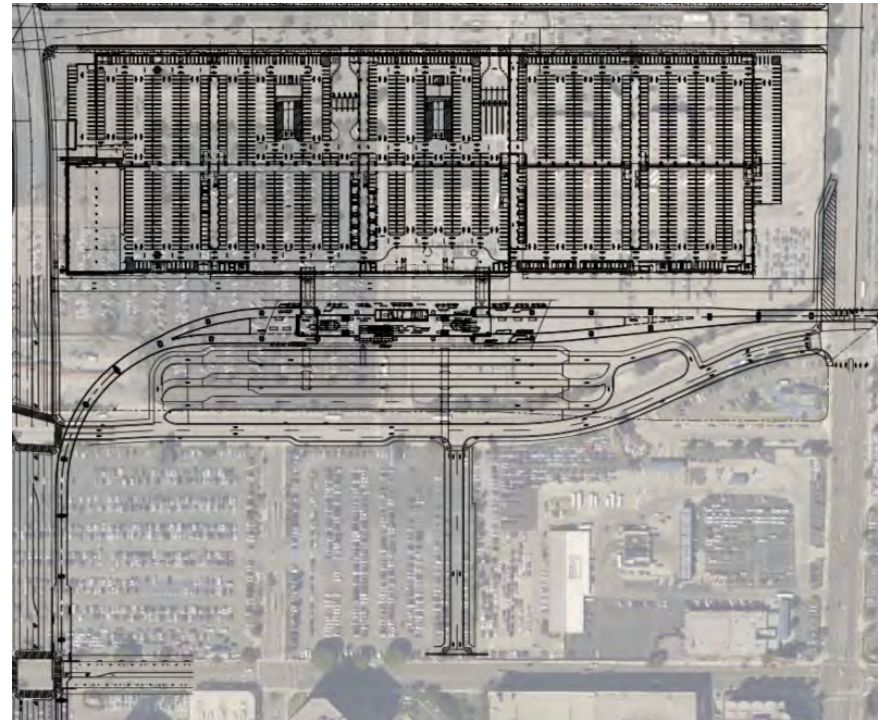
## LAX-it

- Original configuration left eastern  $\frac{2}{3}$  available for construction
- Lot immediately expanded and reconfigured leaving only eastern  $\frac{1}{2}$  available
- Potential for further expansion, leaving less than  $\frac{1}{3}$  available
- SWA's ability to start construction prior to closure of LAX-it requires sufficient portion of site to be available



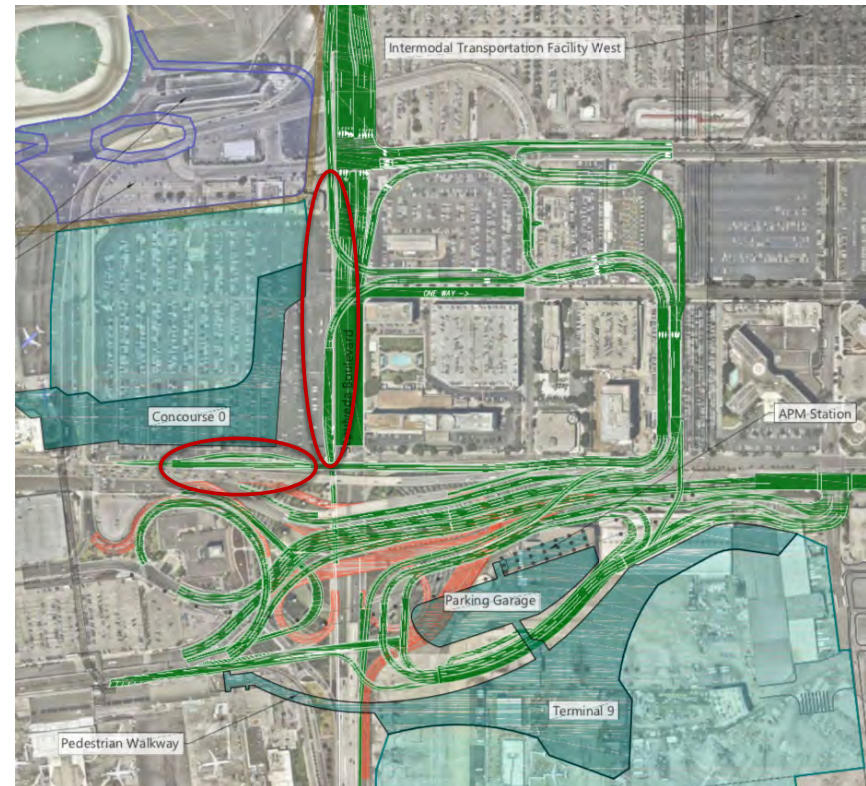
## ITF-West

- No direct interface, but potential location to which Taxi and TNC operations will be relocated
- Programming take account of lessons learned from LAX-it?
- Potential to relocate LAX-it to ITF-West following opening?
  - Avoid dual bussing operations
  - Would allow SWA better site access for terminal development



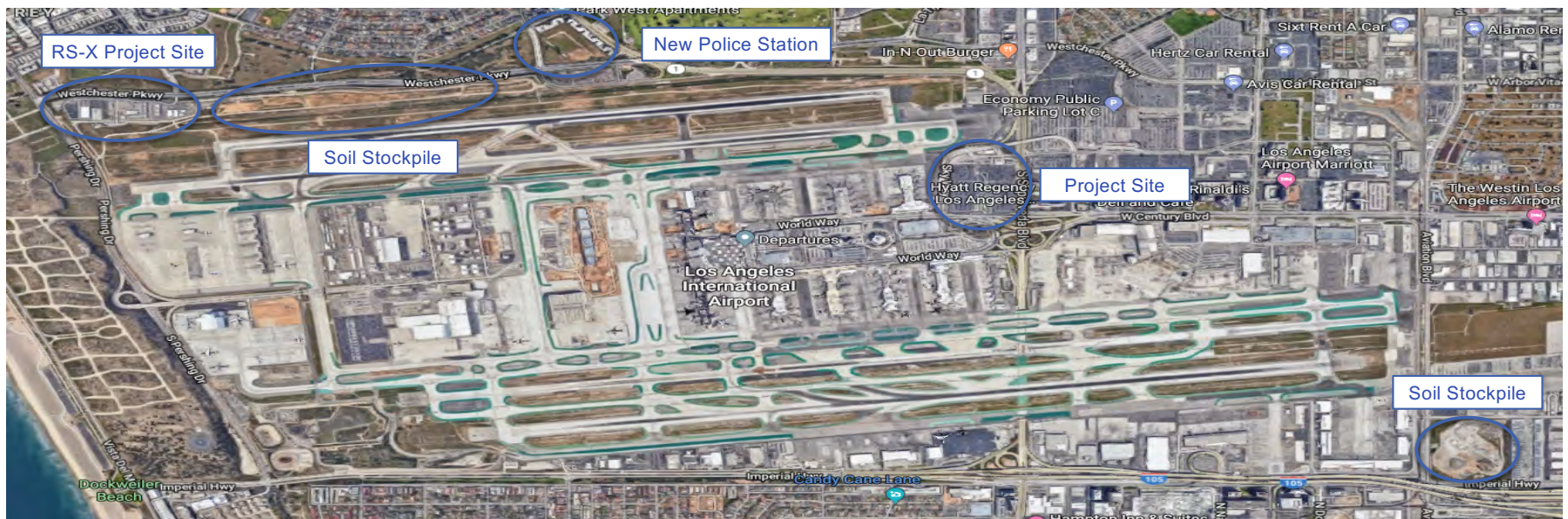
## Roadways – Phase 1 and Phase 2

- On south side, LAWA has entitled slip ramp from Sepulveda/Little Century to the Departures-Level Roadway
- On east side, LAWA has planned two new ramps from/to new elevated roadways to Century Blvd
- Understand roadway concepts are evolving
  - Would like to understand how
  - Need to coordinate interface between projects
    - Potential SWA construction of foundations and columns?



## New Police Station and RS-X Projects

- T1E requires net import up to 175,000 cubic yards of soil
- New police station and RS-X projects are stockpiling soils nearby to reduce project cost, haul impacts, and emissions





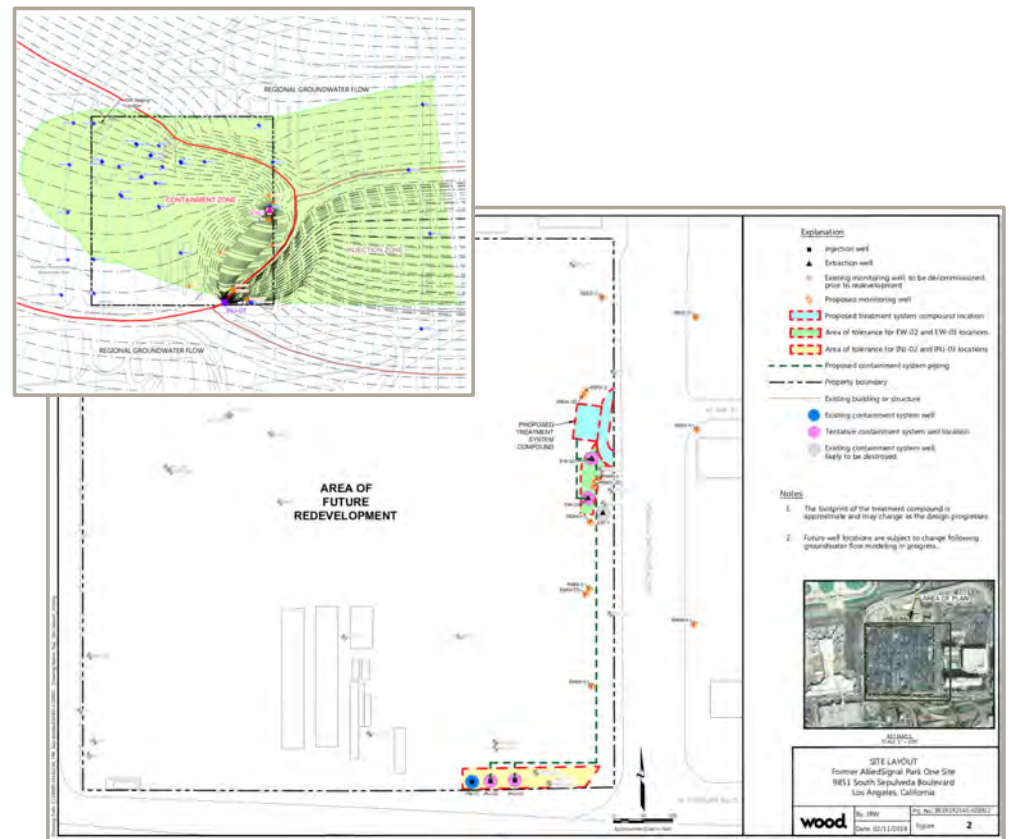
## Post 3

- Post 3 will be displaced as part of T1E development to accommodate airfield improvements
- Potential to relocate east of Sepulveda and preserve Vicksburg/96<sup>th</sup> Street overpass?



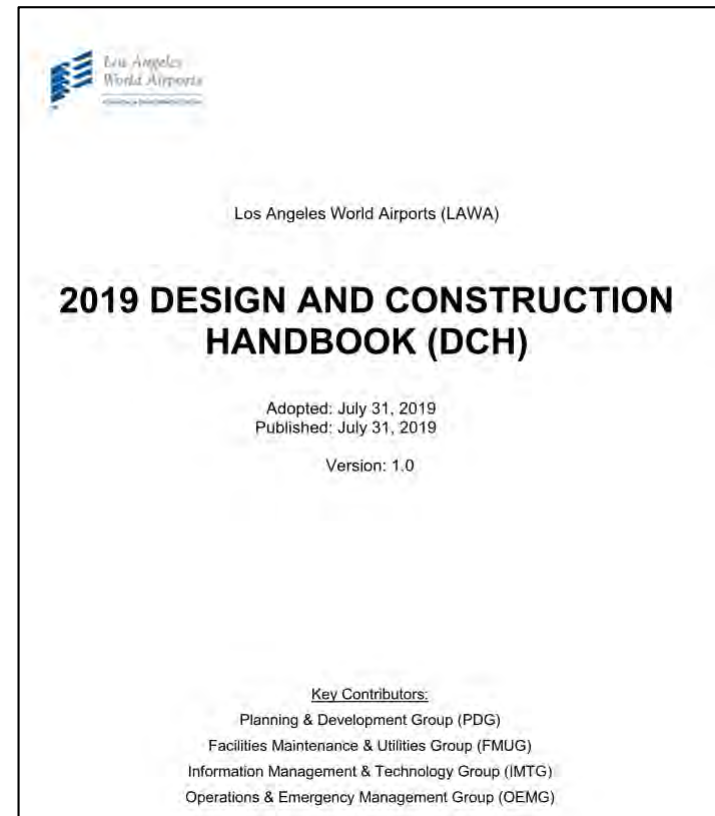
# Environmental Contamination & Remediation

- From 1941-1988, site was used for aerospace manufacturing
- Significant, residual contamination
  - Extends to soils, vapor trapped in soil, and ground water
- Need to cooperate with Honeywell – successor in interest to Allied Signal
  - Closure of multiple wells
  - Ground water treatment



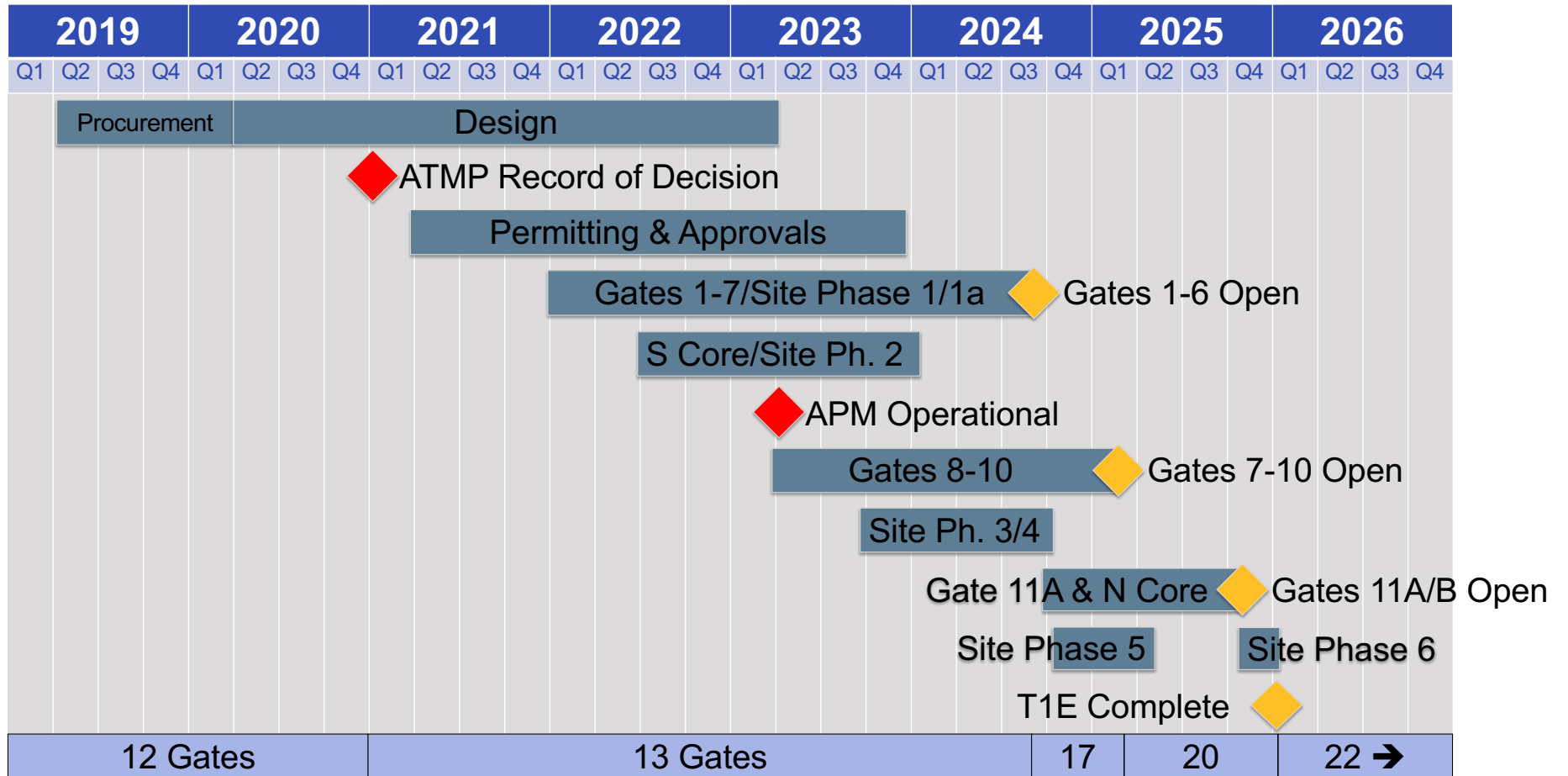
## LAWA Standards

- Significant coordination required
  - Early input needed
    - Before lease signed
  - Timely decisions
- Potential modifications needed to support sustainability efforts



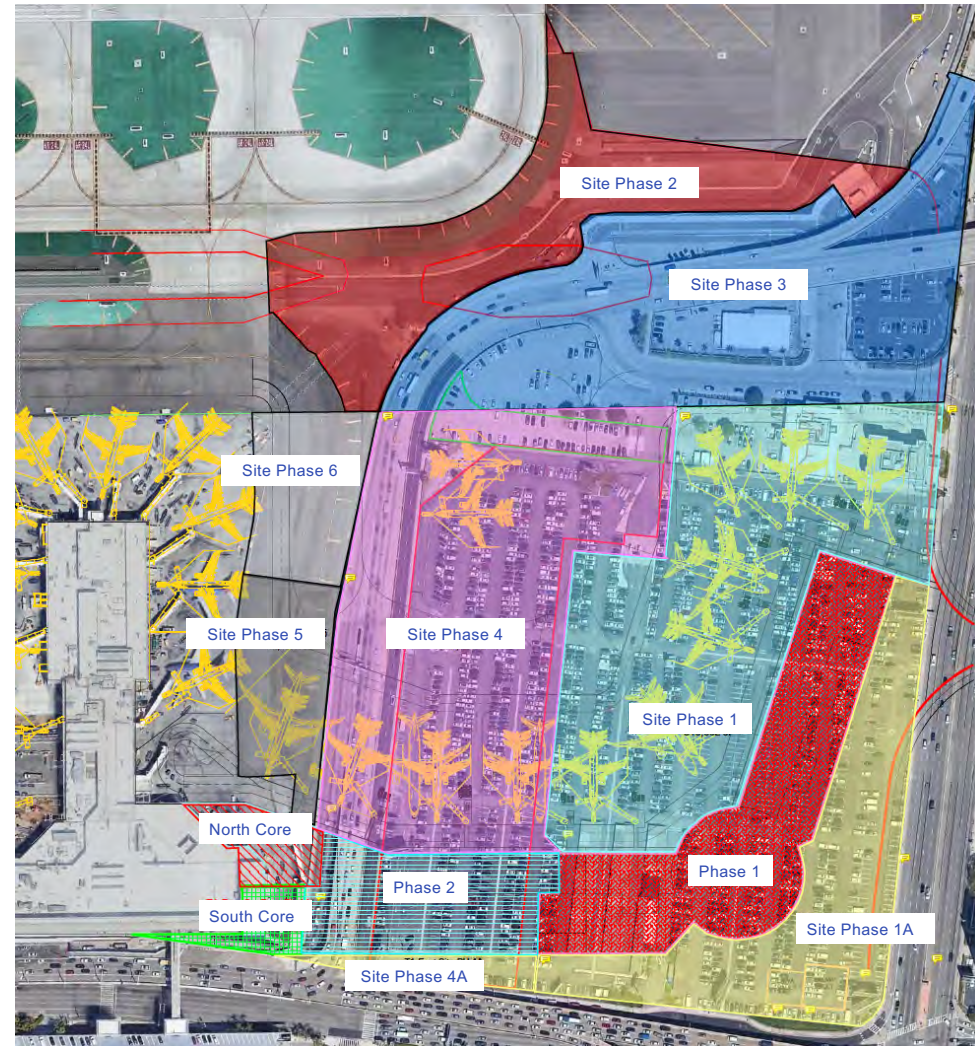
# Preliminary Project Schedule & Phasing

# Terminal 1 East Development Schedule



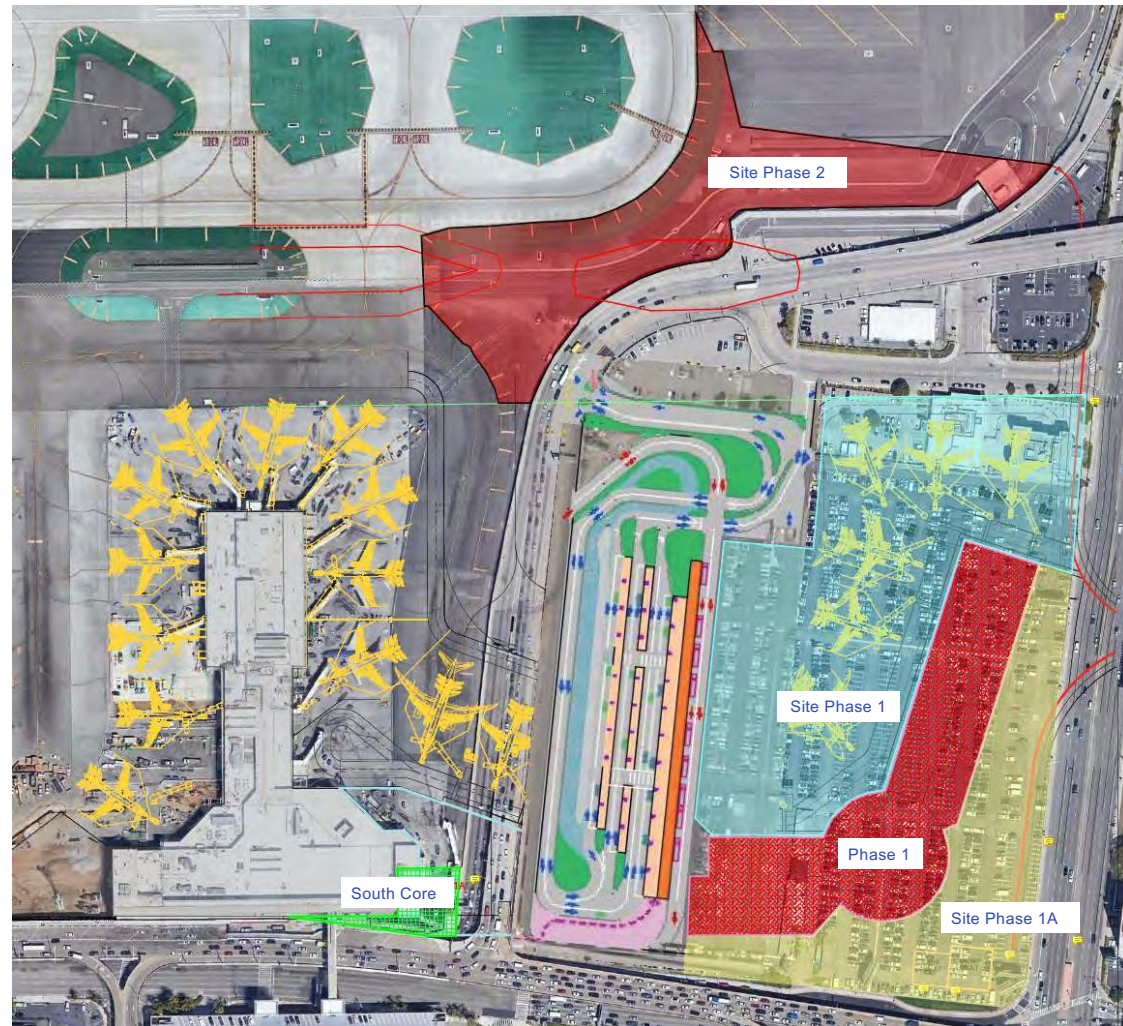
## Preliminary Phasing Plan

- Driven by Southwest's gating requirements and the APM
- Building is broken into four, main parts to facilitate its construction before and after APM opens
- Airfield is broken into six parts, primarily to support flight operations
  - Assumes SWA will construct airfield improvements (Twy D & E) to support terminal operations



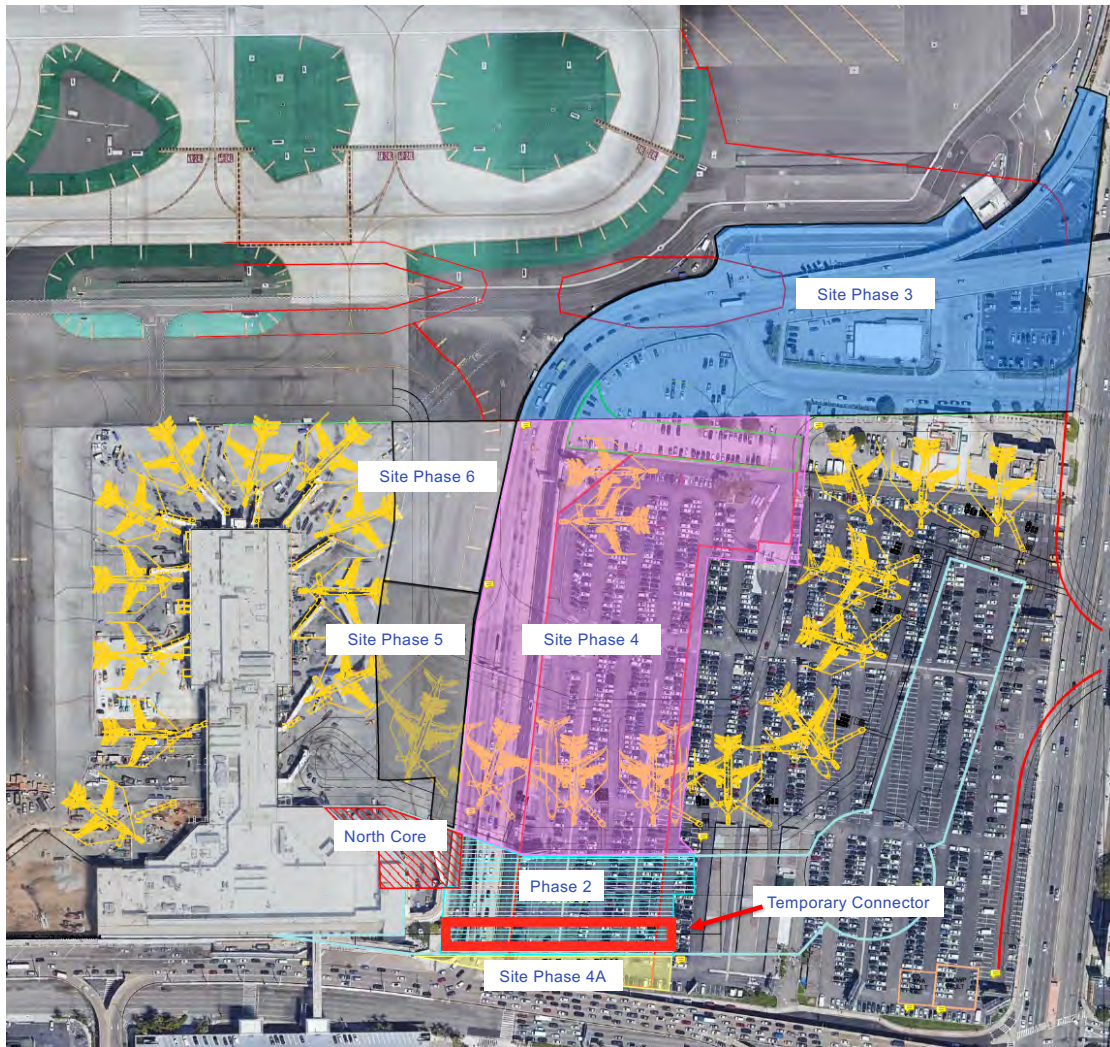
## Pre-APM Work

- Sky Way remains open; Auxiliary Curb in use
- Gates 1-7 and surrounding pavements under construction
- To support connection to T1E east gates, South Core is also under construction
- Airfield north of Sky Way free to proceed



## Post-APM Work

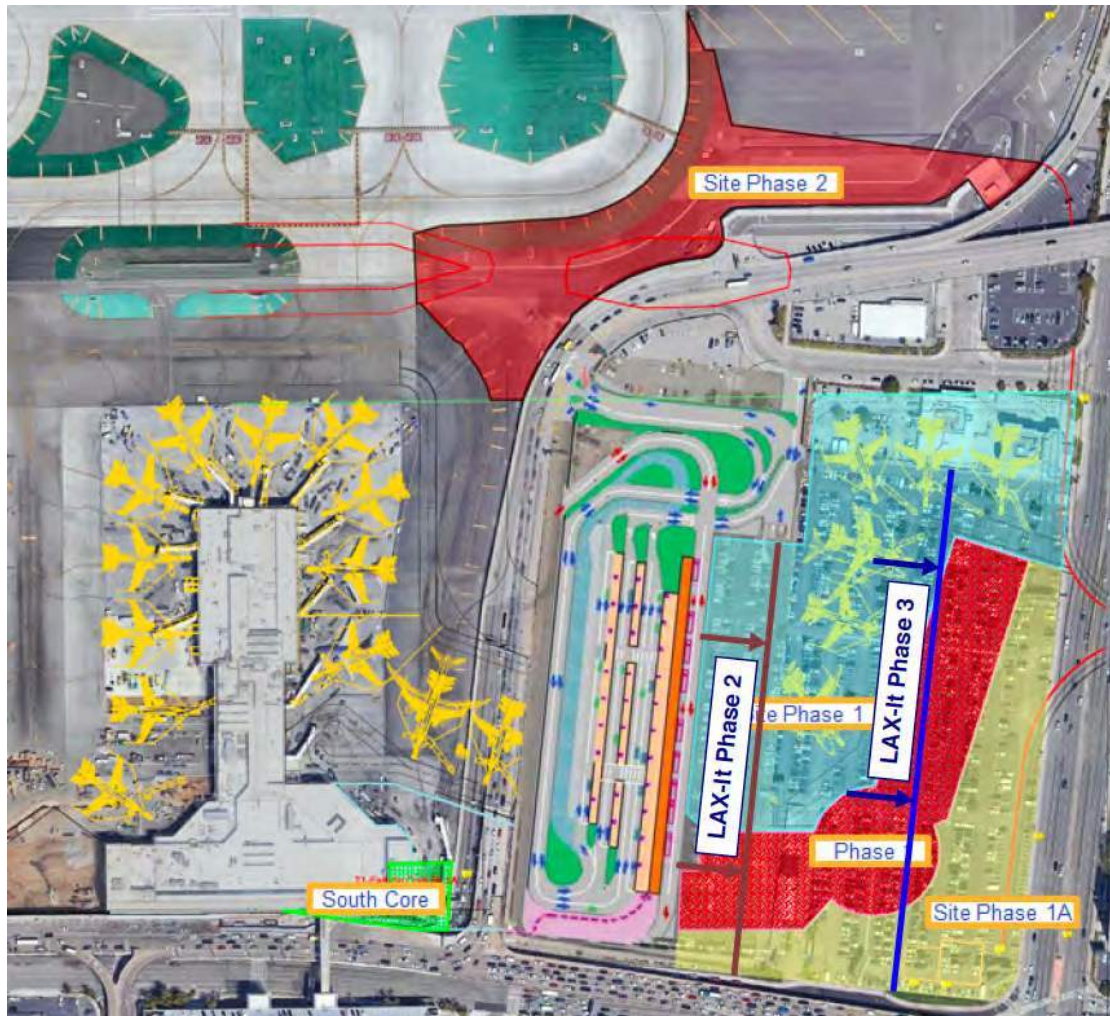
- Sky Way and auxiliary curb demolished
- Structure to support connection to, and pavements to support operation from, Gates 1-6 are initial focus
- Then completion of Gates 8-10 and then 11 & 12
- Finally, pavements to support operations from east side of T1





## Impact of LAX-it Expansion

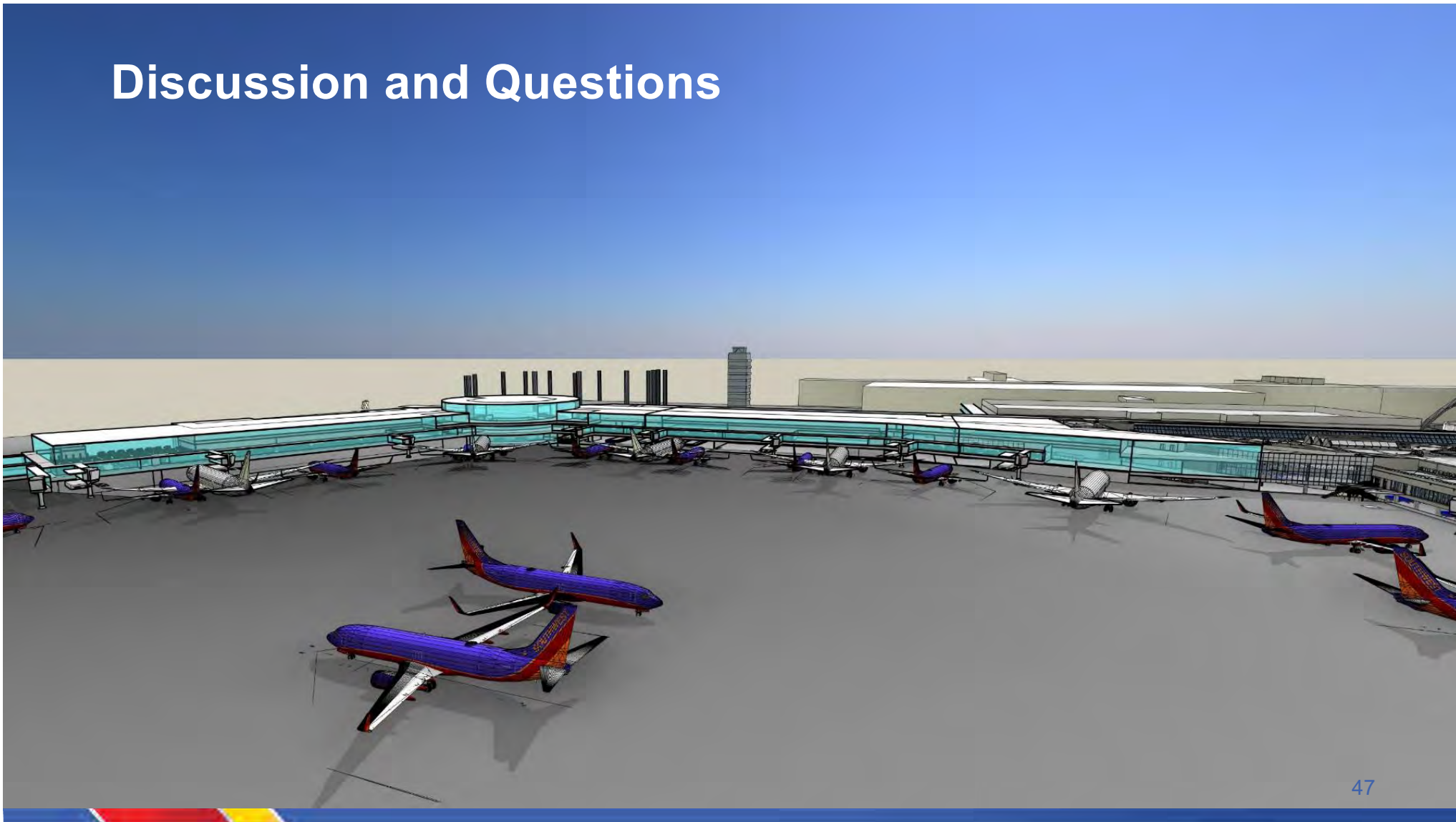
- LAX-it Phase 2 expansion decreases space for Building Phase 1 increases criticality of Building Phase 2
- LAX-it Phase 3 expansion likely precludes construction before LAX-it closure



## Inputs Needed in Near Term to Advance T1E

- Communication and coordination around ATMP
  - We do not want first time SWA sees analysis to be publication of draft EIR
- Ability to advance through TIAP process without lease
  - May not have lease until late 2020
  - Plan to be approaching 30% design at that point in time
- Utilities
  - Must be able to work through, and obtain commitments for, utility service/POCs
  - Ability to rely on Central Utility Plant must be decided very early
    - Otherwise, program will be required to program both boilers and chillers
- Roadway Evolution
  - Directly impacts periphery of site; must be sure to avoid conflicts
  - Look for ways to support/advance development
- Access to LAX-it for geotechnical and environmental investigation

# Discussion and Questions



# **EXHIBIT**

**11**

**Comments on the  
Draft Environmental Impact Report (DEIR) of the LAX Landside Access  
Modernization Program (LAMP)**

**Traffic Growth and Capacity Issues**

The DEIR for the LAX Landside Access Modernization Program (LAMP) fails to adequately assess the growth impacts of the program on aviation activity levels, including air passengers, flight operations, and ground access traffic, and to provide mitigation measures for such growth. It assumes that the growth in aviation activity is unaffected by the program and that the same levels of activity will materialize regardless of whether the program is implemented or not. The DEIR states that airport access constraints do not affect aviation activity.

1. **Capacity Issues:** The airport is a group of components operating in sequence to accommodate traffic/passenger flow (access system-terminals-gates-airfield-airspace). Each of these components is a link in a chain and has a capacity. The lowest capacity of these links constrains flow and determines the capacity of the whole system. This was recognized by the LAX 2004 Master plan which stated: “The most constraining component defines the capacity of the entire airport”. The 2004 master plan considered an unconstrained demand forecast of 98 MAP in 2015 and evaluated four alternative configurations and estimated the airport capacity for each using the principle that this capacity is constrained by that of the lowest capacity component. The four alternatives considered were:
  - a. No Action No Project:
    - i. Capacity of 78 MAP
    - ii. constrained by the Curb and Roadways.
  - b. Alternative A &B including 5<sup>th</sup> runway, increased gates, and Landside Improvement (LAMP):
    - i. Capacity 97.9 MAP
    - ii. constrained by 5-runway airfield.
  - c. Alternative C including increased gates and LAMP improvements, but only 4 runways:
    - i. Capacity 89.6 MAP
    - ii. constrained by 4-runway airfield.
  - d. Alternative D including LAMP improvements and limited to 153 gates:
    - i. Capacity 78 MAP
    - ii. constrained by gates as well as curb and roadways.

The DEIR therefore contradicts the 2004 Master Plan which recognizes the fact that the curb and roadway (access system) can constrain airport capacity and consequently hinder growth, and that LAMP improvements will relieve this constraint and permit aviation activity to grow toward the capacity constrained by the next barrier to growth.

As shown in section 4.12.2-5 the ground traffic analysis contained in the DEIR is based on aviation activity levels of 86 MAP in 2024 and 95 MAP in 2035. These levels of activity could not be accommodated with the access system in its existing condition with its capacity of 78 MAP as determined in the Master Plan.<sup>1</sup>

2. **Demand Forecasting Issue:** In section 6.3.2 the DEIR maintains that the demands forecast will materialize with or without the proposed project. It quotes the FAA 2014 Terminal Area Forecasts as based on local and national economic conditions “independent of the ability of the airport and air traffic control system to furnish the capacity required to meet the demand”. As such the DEIR fails to recognize the difference between “demand” and actual “aviation activity level”, and makes an assumption that permits activity levels to exceed available capacities. It is clear that forecast demand levels will not materialize if the capacity is not provided to accommodate them. The DEIR further quotes the FAA as saying that “...existing constraints are “embedded in historical data” used by the FAA as a base for the forecast” and makes the wrong conclusion that there is “no correlation between activity level and existing conditions of the CTA”. Existing conditions are reflected in historic data which show activity levels resulting from the interaction of demand and supply, and when the supply is limited the activity level cannot exceed that limit. Historic passenger traffic data at LAX did not, and could not reach beyond the 78 MAP capacity of the curb and roadway system, even if economic conditions created the “demand”.

The LAX Master Plan of 2004, while working in the face of 98 MAP forecast recognized that passenger traffic levels could not exceed 78 MAP unless LAMP improvements were made to release that constraint on capacity. The DEIR does not recognize this and implicitly assumes that activity levels up to the airfield capacity constrain will materialize far exceeding the stated capacity of the curb and roadway system. Such growth cannot occur unless the curb and roadway constraint is removed by the implementation of LAMP.

3. **Airport Market Share Issues:** The Los Angeles metropolitan area is served by a number of airports. In a multi-airport region passengers have a choice among airports. This choice has been the subject of many studies that are well documented in the literature. The ACRP report 98, which is quoted in the DEIR, provides a good summary of the findings on this subject. It identifies the primary drivers of airport choice in a multi-airport market such as: the price, air service

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<sup>1</sup> For further information, please refer to “Addressing Future Capacity Needs in the U.S. Aviation System ” report by Eno Center for Transportation (November 2013) ([https://www.ustravel.org/sites/default/files/Media%20Root/USTravel\\_Eno\\_1.pdf](https://www.ustravel.org/sites/default/files/Media%20Root/USTravel_Eno_1.pdf)), which states: “Ground access to the airport at LAX is the most significant chokehold in the airport’s system and according to Los Angeles World Airports (LAWA) airport access infrastructure was projected to hit complete gridlock at 78.9 million annual passengers without improvements to the system. While 78.9 million annual passengers is a precise number [sic], it is accurate enough to mean that adding about 15 million annual passengers above the 62.6 million in 2012 will be too much for the access and gate infrastructure to handle.”

quality, airline/alliance loyalty, and airport ground access. It recognizes airport accessibility as the extent to which passengers can get to the airport from their residence or place of business. This is usually measured by the access time. Numerous studies quoted here and elsewhere recognize the importance of time as a variable affecting airport choice.

LAX remains the primary airport serving the region because of its other service advantages: nonstop flights to more destinations, international connections, wider choice of airlines, etc. But the fact remains that access constraints will affect the airport's share of the market. The ACRP 98 report, concludes based on a the Los Angeles regional case study that<sup>2</sup>:

*“Surface access issues across most of the regional – Passenger commute times remains a primary passenger choice driver in the Los Angeles Basin. Given the presence of several regional facilities across the area, the traffic situation in the Basin drives the airport choice for a large proportion of travelers”.*

To the extent that LAMP improvements will relieve congestion in the CTA and improve travel time for passengers accessing or leaving the LAX terminal area, it will improve LAX's attractiveness relative to other airports in the region and will expand its market shed area. This has been shown to be true repeatedly in airport choice models that have consistently found significant effects of travel time as a factor in airport choice.

Another factor that has been shown to affect passenger airport and mode choice is the travel time reliability. Improving reliability is tantamount to reducing travel time because passengers will need to allow for shorter margins to avoid missing flights. The LAMP improvements will improve reliability by providing regular APM access to the CTA thereby reducing the fluctuations in travel time that arise when congestion is severe.

The DEIR simply dismisses all this by stating that the other factors such as air service quality, flight schedules, price, and loyalty program are the primary factors affecting passenger choice, and that therefore the LAMP improvements will not increase the market share of LAX.

## Summary

The DEIR of the LAMP program incorrectly ignores the aviation activity growth effects of the project. It incorrectly ignores the fact that capacity constraints at the curb/roadway access system will limit airport activity, which cannot grow

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<sup>2</sup> Parella, B.C. et. al. “Understanding Airline and Passenger Choice in Multi-Airport Regions”, Aviation Cooperative Research Program ACRP 98. Transportation Research Board. Washington, D.C., 2013. <https://www.nap.edu/download/22443>

towards the forecast demand level without the improvements in the access system. LAMP improvements are designed to accommodate activity levels of 86 MAP in 2024 and 95 MAP in 2035, levels that clearly could not be accommodated with the current access system with its 78 MAP capacity.

Furthermore, the DEIR ignores the potential effect of the LAMP improvements on LAX's accessibility attractiveness relative to the other airports in the region and the resulting increase in its share of the regional market.

## Recommendation

The DEIR should include a thorough and comprehensive aviation activity modeling analysis to quantify the effect of the LAMP improvements on activity considering regional demand and airport market share. The analysis should evaluate how the reduction in access time and the improvement of access time reliability will improve LAX's accessibility relative to the other airports in the Los Angeles Basin and how that will affect its market share of the total travel demand in the Basin. The aviation activity modeling analysis should also show what effect LAMP will have on passengers' mode choice to LAX and the extent if any to which LAMP will increase public transportation access to the airport. Only with such a thorough and comprehensive analysis would it be possible to assess the aviation activity and environmental impacts of LAMP.



Adib Kanafani

Professor of the Graduate School, University of California at Berkeley. Kanafani holds a Ph.D. in Civil Engineering from the University of California at Berkeley. Since joining the faculty at Berkeley in 1971 he has taught and conducted research on transportation systems, transportation engineering, airport planning and design, and air transportation economics. He has served on a number of national and international advisory panels to Government and industry. He was Director of Berkeley's Institute of Transportation Studies from 1982 to 1997, and Chairman of the Department of Civil and Environmental Engineering from 1997 to 2002, and Co-Director of the National Center of Excellence in Aviation Operations Research from 2001 to 2005. Kanafani's important contributions to air transportation include air transportation demand analysis, airport capacity analysis methods, and airline network analysis. His research on airline hubbing and on the relation between aircraft technology and airline network structure laid the ground for much of the work aimed at understanding the implications of airline deregulation in the late 1970's. He was a member of the research team that developed airport capacity analysis methods that are in widespread application in airport planning and design. Professor Kanafani has authored over 170 publications on transportation, including three books on Transportation Demand Analysis, on National Transportation Planning, and on the Economics of Networked Industries. He is a recipient of numerous including election to the U.S. National Academy of Engineering in 2002. He served as Chair of the Air Transport Division of the American Society of Civil Engineers, and as chair of the Transportation Research Board of the National Academies in 2009 and was named a Lifetime Associate of the National Academies in 2012.

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# **EXHIBIT**

# **12**

TRANSPORTATION  
AVIATION &  
AIRPORT GROUND  
SYSTEMS ACCESS

SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS



APPENDIX  
ADOPTED | APRIL 2016

|  |    |
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| SCAG REGION AIRPORTS                   | 1  |
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| REGIONAL AIR PASSENGER DEMAND FORECAST | 8  |
| AIRPORT DEMAND FORECASTS               | 18 |
| AIRPORT GROUND ACCESS                  | 22 |
| NOTES                                  | 37 |



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APPENDIX  
TRANSPORTATION SYSTEM | AVIATION & AIRPORT GROUND  
ACCESS

ADOPTED | APRIL 2016

# AVIATION AND AIRPORT GROUND ACCESS

## SCAG REGION AIRPORTS

### INTRODUCTION

As illustrated in [EXHIBIT 1](#), the six counties of Southern California that make up the SCAG region are home to an airport system of more than 50 airports. The airport identifier codes assigned by the Federal Aviation Administration to the region’s airports are listed in [TABLE 1](#). Ten of the airports are commercial airports, of which six had schedule commercial airline services in 2012, and one (March Inland Port, RIV) is a joint-use military airfield.

Because Southern California is a region with multiple airports that have overlapping catchment areas, travelers to and from the region can choose among several airports for their needs. Predicting future traffic levels at individual airports cannot be done in isolation and must consider the trends and dynamics occurring at other regional airports.

Therefore, to develop the projections of future activity, a forecast methodology has been adopted that blends a macro-economic forecast model relating historic passenger traffic to key socioeconomic variables for the entire SCAG region, with a traffic allocation model that allocates traffic across the individual airports based on factors that are known to drive a passenger’s preference for a certain airport.

### HISTORICAL COMMERCIAL PASSENGER TRAFFIC DEVELOPMENT

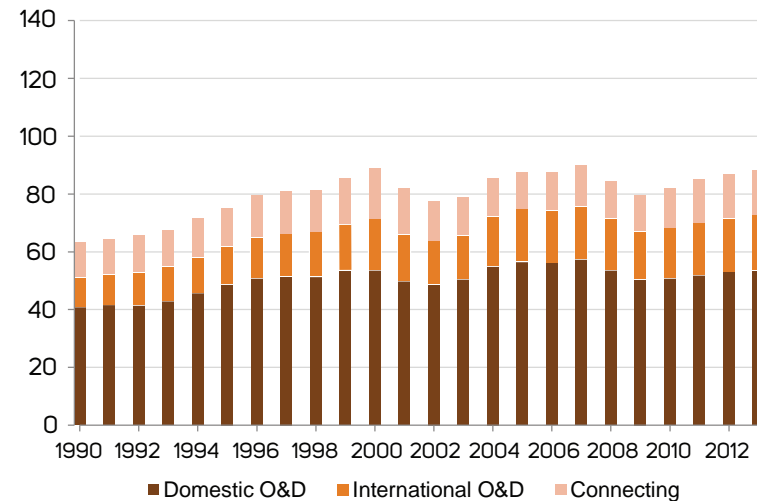
As illustrated in [FIGURE 1](#), aggregate historic passenger traffic at the SCAG region airports increased from 63.0 million annual passengers in 1990 to 88.0 million annual passengers in 2013, equivalent to a compound annual growth rate of 1.5 percent. In the last decade of the 20th century, traffic at the SCAG region airport system experienced a faster growth than had occurred over 1975-1990. In the period between 1990 and 2000, passenger traffic increased at an average growth rate of 3.4 percent, reaching a high of 88.7 million annual passengers in 2000. Following the terrorist attacks of September 11, 2001, the number of passengers decreased significantly. A softening economy in combination with tightened airport security measures led to weakened demand conditions and a decline in passenger traffic. Only in 2007, when the airports in the SCAG region handled 89.4 million passengers, did traffic finally exceed the previous high achieved in 2000. The recovery did not last long though, as the global financial crisis of 2007 had a profound impact on the air transport market in the United States, particularly California, where the housing crisis was severe. As a result, traffic numbers decreased to 79.0 million passengers in 2009, before demand conditions gradually improved again.

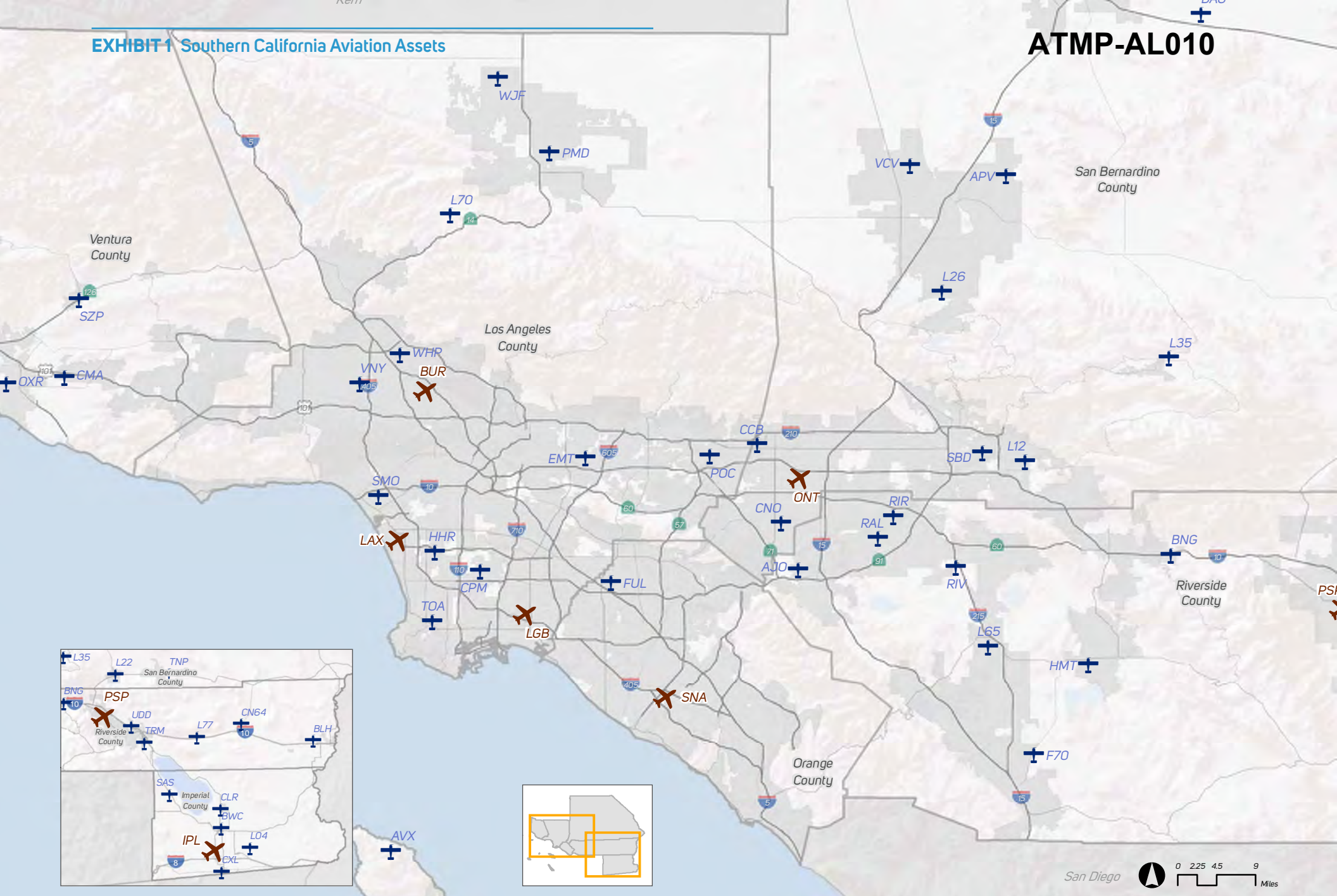
Throughout the historic period reviewed, the domestic market accounted for the majority of origin and destination (O&D) traffic at the SCAG region airports. Although the international segment gained importance, domestic O&D traffic in 2013 still accounted for 73.4 percent of total O&D traffic, compared to 80.4 percent in 1990. In addition to O&D traffic, the airport system in the SCAG region also handles a substantial amount of connecting traffic. The share of connecting passengers at the airports in the SCAG region has hovered around 17 percent of total enplaned and deplaned (E/D) passengers during the historic period reviewed.


### AIRPORT PROFILES


Los Angeles International Airport (LAX) is the busiest airport located in the SCAG region in terms of passenger volume. As illustrated in [FIGURE 2](#), LAX handled nearly three quarters of all commercial passenger traffic in the SCAG region in 2012. John Wayne Airport (SNA), located in Orange County, is the second busiest airport, followed by LA/Ontario International Airport and Burbank Bob Hope Airport. See the following pages for profiles of the six major airports in the SCAG region that currently have commercial service.

**FIGURE 1** Historic Traffic Development SCAG Region Airports





 Airports with scheduled service

 All other airports

Source: SCAG, 2015

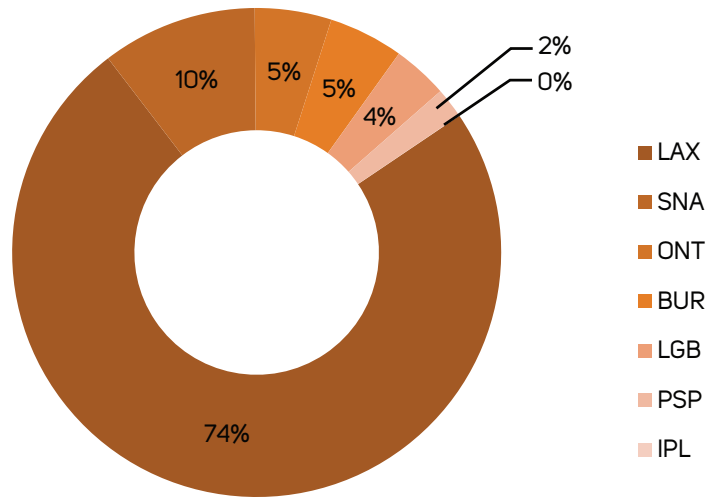
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**TABLE 1** Airport Identifier Codes

| Airport Code | Airport Name                                |
|--------------|---|
| L70          | Agua Dulce Airpark                          |
| APV          | Apple Valley Airport                        |
| OO2          | Baker Airport                               |
| BNG          | Banning Municipal Airport                   |
| DAG          | Barstow-Daggett Airport                     |
| UDD          | Bermuda Dunes Airport                       |
| L35          | Big Bear City Airport                       |
| BLH          | Blythe Airport                              |
| BUR          | Bob Hope Airport, Burbank                   |
| POC          | Brackett Field, La Verne                    |
| BWC          | Brawley Municipal Airport                   |
| CCB          | Cable Airport                               |
| CXL          | Calexico International Airport              |
| CMA          | Camarillo Airport                           |
| AVX          | Catalina Airport                            |
| 49X          | Chemehuevi Valley Airport                   |
| CNO          | Chino Airport                               |
| L77          | Chiriaco Summit Airport                     |
| CLR          | Cliff Hatfield Memorial Airport, Calipatria |
| CPM          | Compton/Woodley Airport                     |
| AJO          | Corona Municipal Airport                    |
| CN64         | Desert Center Airport, Palm Desert          |
| RIR          | Flabob Airport, Riverside                   |
| F70          | French Valley Airport                       |
| FUL          | Fullerton Municipal Airport                 |
| WJF          | General William J. Fox Airfield, Lancaster  |
| HHR          | Hawthorne Municipal Airport                 |
| HMT          | Hemet-Ryan Airport                          |
| L26          | Hesperia Airport                            |

| Airport Code | Airport Name                                       |
|--------------|--|
| IPL          | Imperial County Airport                            |
| TRM          | Jacqueline Cochran Regional Airport, Thermal       |
| SNA          | John Wayne Orange County Airport                   |
| LGB          | Long Beach Airport                                 |
| LAX          | Los Angeles International Airport                  |
| RIV          | March Air Reserve Base (March Inland Port)         |
| EED          | Needles Airport                                    |
| ONT          | Ontario International Airport                      |
| OXR          | Oxnard Airport                                     |
| PSP          | Palm Springs International Airport                 |
| PMD          | Palmdale Regional Airport                          |
| L65          | Perris Valley Airport                              |
| L12          | Redlands Municipal Airport                         |
| RAL          | Riverside Municipal Airport                        |
| SAS          | Salton Sea Airport                                 |
| SBD          | Sam Bernardino International Airport               |
| EMT          | San Gabriel Valley Airport                         |
| SMO          | Santa Monica Airport                               |
| SZP          | Santa Paula Airport                                |
| VCV          | Southern California Logistics Airport, Victorville |
| TNP          | Twenty Nine Palms Airport                          |
| VNY          | Van Nuys Airport                                   |
| WHP          | Whiteman Airport, Pacoima                          |
| L22          | Yucca Valley Airport                               |
| TOA          | Zamperini Field, Torrance                          |

FIGURE 2 Market Share of Commercial Airports in 2012



## SOCIO-ECONOMIC OVERVIEW

### INTRODUCTION

Demand for air travel is derived from socioeconomic interactions between origin and destination markets. Local economic activities generate the need for air travel, while the personal wealth of the local population drives discretionary spending, such as leisure trips requiring air travel. Additionally, an ethnically diverse region home to a significant number of foreign-born residents, such as Southern California, generates demand for air travel internationally, as friends and relatives maintain close ties.

There is a proven close relationship between economic activity and annual traffic growth. This relationship is illustrated in **FIGURE 3**, which shows the passenger traffic growth in the United States between 1990 and 2013 compared to overall economic growth. As the figure illustrates, air traffic activity trends upward with positive economic growth, and trends downward with negative or flat source-country economic growth. Passenger traffic in Southern California also has a high correlation to economic activity in the local market and its major source markets.

Comparatively speaking, air transport is one of the market sectors with the longest product life cycles as a result of high capital investment costs. During these lengthy life cycles, the relevant economic, social and political environment will change considerably.

FIGURE 3 Relationship Between Air Travel and Economy

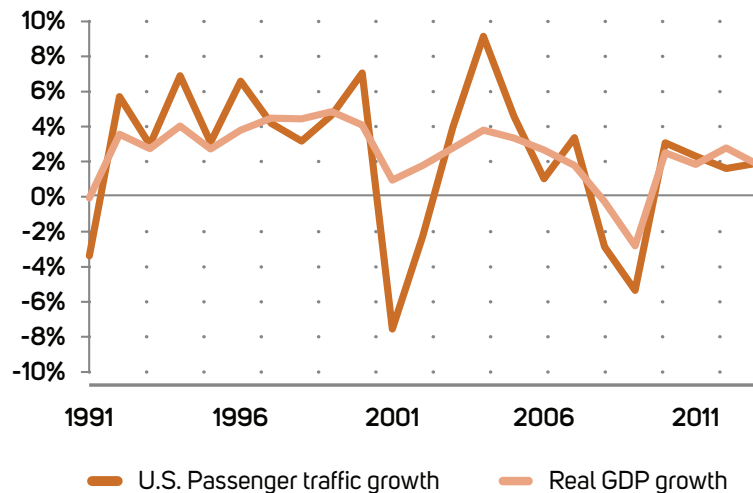
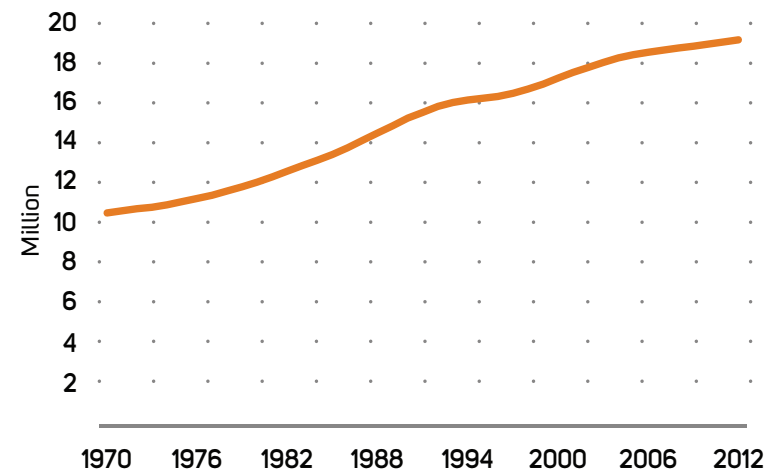
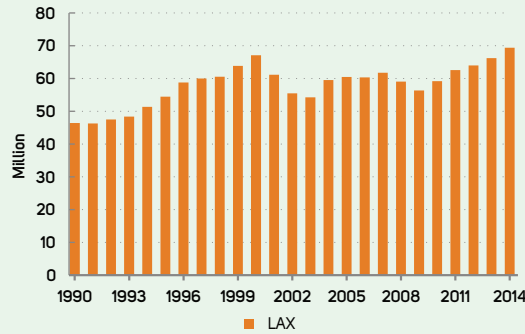


FIGURE 4 Historical Population Development in Southern California





# AIRPORT PROFILES

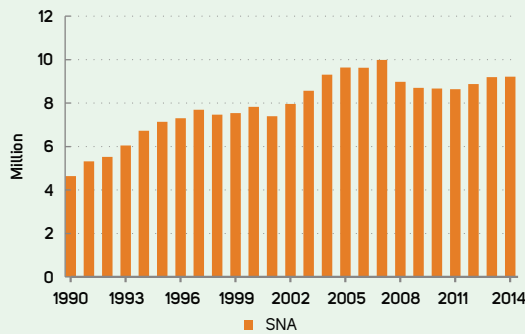


## LOS ANGELES INTERNATIONAL AIRPORT

Following a decade of continuous growth in the nineties, passenger traffic at LAX is still recovering from the impact of subsequent exogenous shocks, including 9/11 and the global financial crisis. Passenger traffic in 2014 was up 6% compared to the previous year; the total of 70.66 million annual passengers was the first time the airport exceeded the previous high of 67.1 million attained in 2000.

Los Angeles International Airport is the primary airport serving the Greater Los Angeles Area and is a hub for the major US legacy carriers American Airlines, Delta, and United, in addition to Alaska Airlines and Virgin America.

Besides serving an extensive domestic network, LAX is also a key international gateway, with flights to six continents, and is also a major cargo airport.

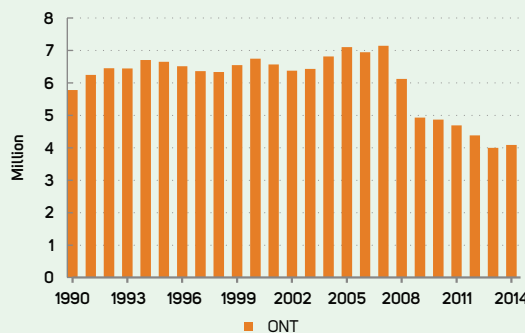


## JOHN WAYNE AIRPORT

John Wayne Airport is located in unincorporated Orange County, near the cities of Santa Ana, Irvine, Newport Beach and Costa Mesa. The airport is the second busiest airport in the SCAG region.

Passenger traffic at the airport has been more resilient to exogenous shocks than the other airports in the area. Demand recovered quickly after 9/11; however, the global financial crisis negatively affected demand for air travel in Orange County. Total passenger traffic in 2014 was 9.2 million, below the high of 10.0 million in 2007.

In 2014, Southwest was the largest carrier operating at the airport, followed by United, American, Delta, Alaska Airlines, and US Airways. The air service pattern is mostly focused on cities in western United States as well as the main hubs of the legacy airlines.



## LA/ONTARIO INTERNATIONAL AIRPORT

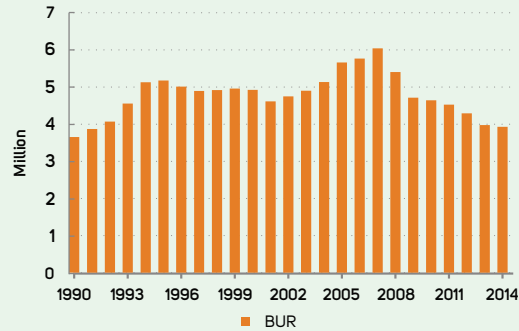
LA/Ontario International Airport is located in Ontario in San Bernardino County. Los Angeles World Airports (LAWA) owns and operates the airport today. LAWA has agreed to terms and conditions for the transfer of the airport in the coming months to a new airport sponsor, the Ontario International Airport Authority (OIAA), pending review and approval by the Federal Aviation Administration (FAA).

Following the global financial crisis, passenger traffic at the airport dropped sharply from 7.1 million in 2007 to just under 4 million in 2013. Passenger traffic increased by 3.4% between 2013 and 2014.

In 2014, Southwest was the largest carrier operating at the airport. The air service pattern is mostly focused on cities in western United States as well as the main hubs of the legacy airlines.

The airport is also a major cargo hub for UPS, facilitated by its geographic position, long runways, and relatively limited noise restrictions allowing for 24/7 operations.

# AIRPORT PROFILES

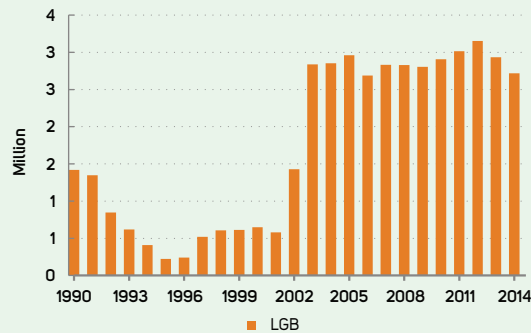


## BURBANK BOB HOPE AIRPORT

Bob Hope Airport is located northwest of downtown Burbank in Los Angeles County, serving the northern part of the Greater Los Angeles Area.

In recent years, passenger traffic at the airport has significantly declined from 6.0 million passengers in 2007 to 3.9 million passengers in 2014.

Southwest is the largest airline operating at the airport, serving mainly cities in the western United States.

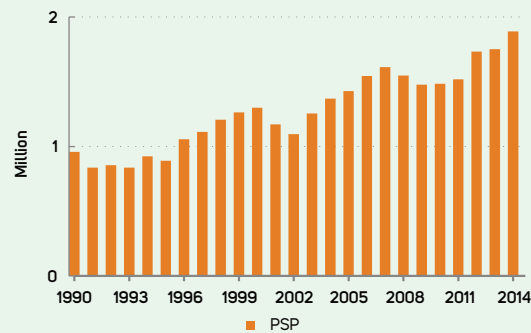


## LONG BEACH AIRPORT

Long Beach Airport is located northeast of the city of Long Beach in Los Angeles County.

The arrival of low-cost carrier JetBlue in 2001 led to a rapid increase in air traffic, and solidified LGB’s position as an alternative to LAX for flights to the East Coast.

Due to stringent noise restrictions, the number of daily slots is currently restricted to 41, of which JetBlue operates 31. As a result of the local noise compatibility ordinance, traffic levels have been relatively steady, hovering around 3 million annual passengers. It is anticipated that the City of Long Beach will soon allow an additional 9 commercial departures per day based on the terms of the ordinance (for a total of 50 daily commercial departures).



## PALM SPRINGS INTERNATIONAL AIRPORT

Palm Springs International Airport is located in the desert resort city of Palm Springs in the Coachella Valley in Riverside County. The airport mainly caters to seasonal leisure travelers visiting the area during the winter.

Except for a few setbacks following the events of 9/11 as well as the global financial crisis, passenger traffic at the airport has increased steadily. In 2014 the airport handled 1.9 million passengers, which was a 9% increase compared to the previous year.

The main US carriers, such as United, Alaska, Southwest, and American all operate at PSP. Some carriers only provide service during the peak season.

# AIRPORT PROFILES

## IMPERIAL COUNTY AIRPORT

Imperial County Airport is located in the city of Imperial in Imperial County, approximately twelve miles north of the California-Mexico border. The airport provides limited scheduled air service and also serves the general aviation needs of the surrounding communities.

Imperial County Airport is currently part of the Essential Air Service (EAS) program through the United States Department of Transportation, providing the residents of Imperial County a connection to the national aviation system. Passenger traffic peaked in 2001, with approximately 30,000 annual passengers, before gradually decreasing following the events of 9/11. Traffic began rebounding in 2006 before declining again after the global financial crisis. The airport participates in the federal Essential Air Service (EAS) program, which subsidizes air service to eligible small community airports.

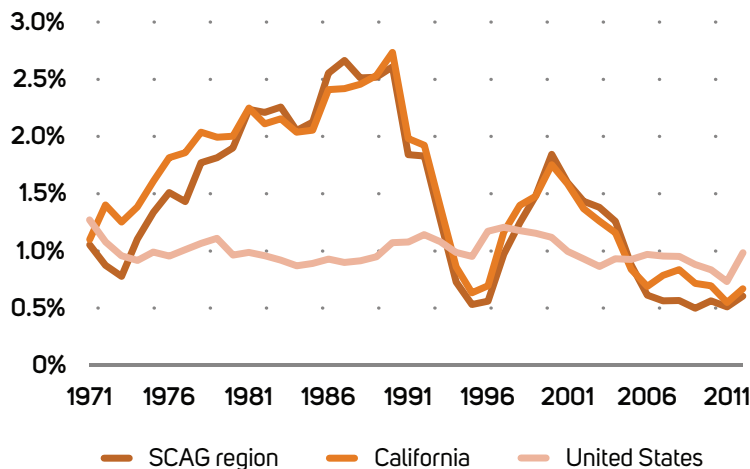
Such change affects the expected trends in traffic growth, and these market dynamics profoundly influence air carrier decisions on fleet and network expansion, which in turn affect airport developments. Given their relevance to air travel trends and developments, the following subsections highlight the socioeconomic conditions in the region.

## POPULATION

The population of the SCAG region was about 18.2 million in 2012, as shown in **FIGURE 4**. Since 1970, population has increased at an average annual growth rate of 1.4 percent, although the average growth rate slowed down to 0.9 percent over the decade between 2002 and 2012. This rate of growth is not excessive, indicating that it is sustainable with appropriate investments in the economy. From 2013 to 2040, the population growth is projected to slow down even further to an average rate of 0.7 percent per year, which is consistent with the growth rates that have been experienced in recent years. A growing population drives the potential pool of travelers and is an indicator for future demand levels.

Historically, population growth in California as well as Southern California has outpaced national population growth, as illustrated in **FIGURE 5**. The diverse and large economies, proximity to the coast, and heavily-populated metropolitan areas have attracted a large share of immigrants from other states as well as other nations. Since 2004, however, the trend has reversed, and the country's overall population has increased at a faster rate than the population in the SCAG region.

**FIGURE 5** Historical Population Development in Southern California, California, and the United States



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## ECONOMY

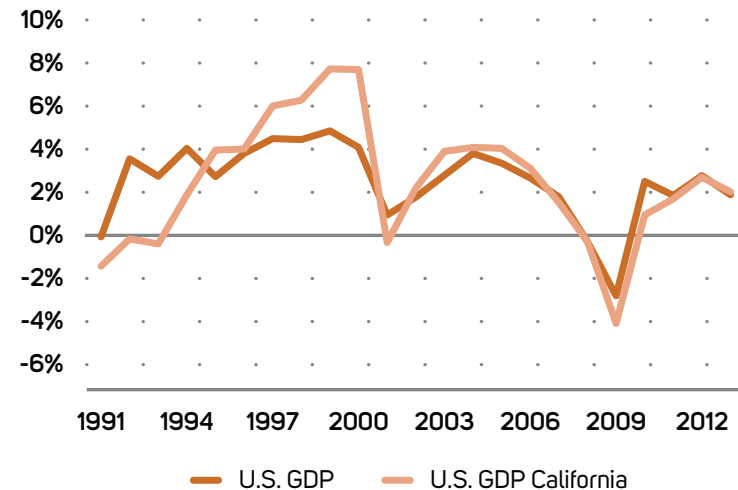
As shown in **FIGURE 6**, the economy of California has experienced a somewhat cyclical growth pattern over the past decades. Slow growth during the 1990s recession was followed by an accelerated growth leading to the peak of the dot-com bubble in 2000. During this phase, the growth of the Californian economy actually outpaced national economic growth. While the economy recovered following the dot-com bust in 2001, the financial crisis led to another contraction of the region's economic output. While the region took a very hard hit during the global financial crisis, overall growth in Southern California is pointing toward continued economic recovery and progress.

## REGIONAL AIR PASSENGER DEMAND FORECAST

### INTRODUCTION

Air travel is a derived demand. Demand for air transportation between origin and destination markets is derived from the socioeconomic interactions between these markets, shaped by carriers' networks and available airlift capacity. Generally, business/trade activity, tourism/visitor activity, and "visiting friends and relatives" (VFR) constitute the primary components of air travel at an airport.

**FIGURE 6** Historical Development of California and the United States Gross Domestic Product in Real Terms



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Dependable forecasting practice requires awareness of the uncertainties surrounding the forecasts. Considerable effort has been devoted to analyzing the factors affecting traffic activity at the airports in the SCAG region. However, as with any forecasts, there are uncertainties regarding these factors, such as the outlook for the local and world economies and the structure of the airline industry. A pragmatic and yet systematic approach has been used to produce a set of unbiased aviation activity forecasts for the region's airports.

As mentioned earlier, Southern California is a region with multiple airports that have overlapping catchment areas. Therefore, travelers to and from the region have the option to choose among several airports for their needs. Predicting future traffic levels at individual airports cannot be done in isolation and must consider the trends and dynamics occurring at other airports in the region. Since the catchment areas of the airports of San Diego, Carlsbad and Santa Barbara also overlap with the SCAG region, they have also been considered in the analysis.

To develop the projections of future activity, a forecast methodology has been adopted that blends a macro-economic forecast model relating historic passenger traffic to key socioeconomic variables for the entire SCAG region, with a traffic allocation model that allocates traffic across the individual airports based on factors that are known to drive a passenger's preference for a certain airport. The methodology is illustrated in **EXHIBIT 2**. For intra-California and short-haul domestic travel the model incorporates price and time competitiveness with other modes of travel, such as driving, conventional rail and High Speed Rail. The following sections elaborate upon the methodology used in

each step of the forecasting process. The resulting forecasts are presented after the discussion of the methodology.

### DOMESTIC O&D TRAFFIC

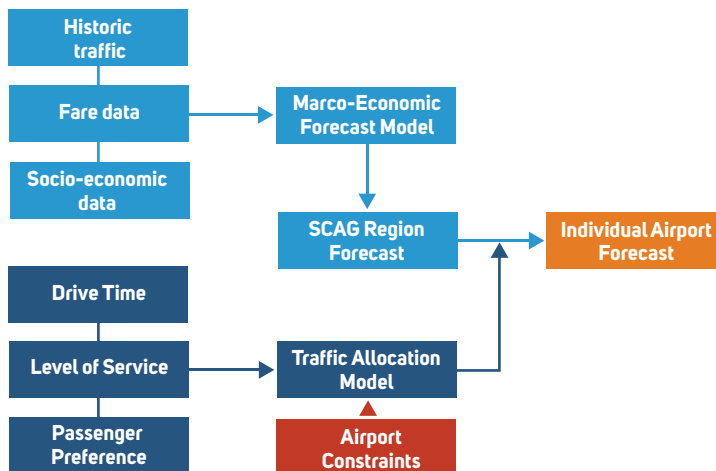
Recognizing that different market regions have different demand drivers and dynamics, passenger O&D markets are typically divided into different market segments. This can be done based on characteristics of the market, such as geography and length of flight. By analyzing historic O&D traffic levels, domestic air passenger traffic to the region was divided into three key domestic market segments.

- Intra-California;
- Short-haul; and
- Medium-Long haul

The forecasting team investigated linear and logarithmic regression models before settling on a log-log specification. Log-log transformed models are typically used in air traffic forecasting, because taking the natural logarithm of the variables improves the model fit, and it also allows the regression coefficients to be easily interpreted as an elasticity, e.g. a 1 percent change in GDP is associated with a proportional percentage change in passenger traffic.

The following sections elaborate on the forecast methodology that was used for each domestic market segment.

### EXHIBIT 2 Forecast Methodology



### INTRA-CALIFORNIA O&D TRAFFIC

To prepare the O&D passenger forecast for the Intra-California market segment the following approach was used:

1. Through an econometric modeling approach, the historic Intra-California O&D passenger traffic to the SCAG region airports, including the airports of San Diego, Carlsbad and Santa Barbara, has been related to the historic development of various socio-economic variables such as the economic growth in the region, population, per capita incomes, fare levels, crude oil prices and others.
2. A regression analysis has been performed to identify the variables that have the strongest correlation with the historic traffic development. Using the regression analysis, the Gross Regional Product of California (in real terms) and airfares proved to be the variables that best explain the development of Intra-California passenger traffic between 1990 and 2000. The regression analysis produced an  $R^2$  value of 0.89, indicating that these variables are expected to serve as reliable

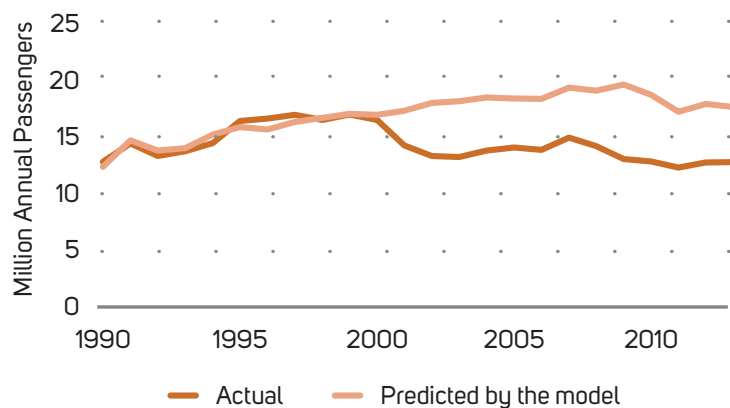
predictors of future traffic development. The tightened security measures post 9/11 significantly increased passenger processing times at airports throughout the country and forced travelers to show up at the airport considerably earlier than before. Especially on short routes within California, the impact of the increased processing times had a relatively large impact on the total trip time. Road transport became a viable alternative, and, consequently, demand for air travel within California declined. This development is also illustrated in **FIGURE 7**, which shows the fit of the values generated by the regression model in comparison with actual historic traffic levels. After the events of 9/11, intra-California O&D passenger traffic dropped significantly until bottoming out in 2003. While the change in passenger behavior post 9/11 could not be anticipated by the regression model, the values produced by the model continue to follow a similar trend as actual traffic, and the model therefore remains a reliable predictor of future intra-California traffic levels, albeit it at a higher level. The difference between the values produced by the regression model and the actual values can be interpreted as a fair representation of the amount of passenger traffic that switched to other modes of transport.

3. The final model for Intra-California O&D traffic can be described by the following equation:

$\text{Ln}(\text{Intra-California Traffic}) = c1 + c2 * \text{Ln}(\text{Real California GDP}) + c3 * \text{Ln}(\text{Real Intra-California Fares})$  where:

- Ln is the natural log of the variable
- Intra-California traffic is O&D traffic within California

**FIGURE 7** Goodness-of-fit Intra-California Traffic Model



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- Real California GDP is the Gross Regional Product of California adjusted for inflation
- Real Intra-California Fares are the fares on Intra-California routes in real U.S. dollars
- c1, c2, and c3 are the estimated model parameters capturing the impact of various factors on Intra-California traffic growth

The econometric model describing intra-California traffic resulted in the following values for the dominant parameters, or elasticities:

- GDP elasticity of 0.54
- Air Fare coefficient of -0.56

Considerable research (e.g., *Air Travel Demand Elasticities: Concepts, Issues and Measurement*, D. Gillen, W.G. Morrison and C. Stewart, 2002) has established a positive relationship between economic growth or income growth and air travel. In many cases, demand for air travel grows at a rate higher than that of the economy, so that each one-percent increase in GDP results in air traffic growth of 1 percent to 2 percent. However, as markets mature, GDP elasticity tends to decline – further GDP growth has a smaller impact on air travel growth. The United States tends to have relatively low elasticities between economic growth and air travel demand. Domestic U.S. air travel demand is often recognized to have an elasticity ratio to economic growth of 1 to 1. In contrast, a developing economy with travel to long-haul destinations may have elasticities exceeding 2 to 1. The regression results indicate a GDP parameter typical for a mature market such as within California: each one percent increase in GDP results in a 0.54 percent increase in traffic.

Research on air fare elasticities have produced values of between -0.2 and -2.0 (for example, see [http://www.iata.org/whatwedo/Documents/economics/Intervistas\\_Elasticity\\_Study\\_2007.pdf](http://www.iata.org/whatwedo/Documents/economics/Intervistas_Elasticity_Study_2007.pdf)). The fare elasticity estimates produced by the model fall within that range. Fare elasticities are affected by a range of factors, such as competition dynamics, income levels, and market maturity. The domestic model shows a moderate sensitivity to fare changes.

4. Using forecasts of the California Real Gross Domestic Product and a forecast of real air fares, future domestic forecast levels could be generated. Since 1945, airline yields and fares have declined on an almost continual basis. Between 1990 and 2008, U.S. system-wide yields declined by an average of 2.4 percent per annum. This decline has been the result of technological improvement, increasing load factors, and strong competition, particularly from low cost carriers. Much of this is the consequence of deregulation both within the U.S. and with international jurisdictions (e.g., open skies agreements). However, in recent years, yields in the U.S. have increased slightly, the result of high fuel prices and, more recently,

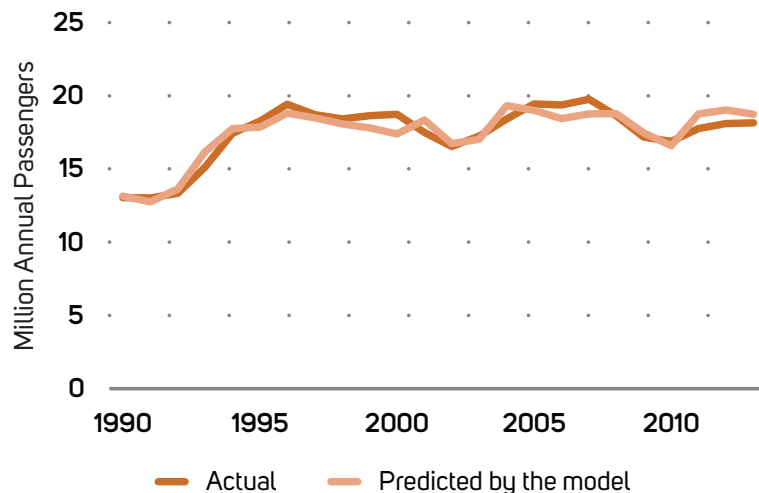
capacity restraint by U.S. carriers. It is assumed that these factors offset each other and air fares remain constant in real terms over the forecast period.

## DOMESTIC SHORT-HAUL O&D TRAFFIC

To prepare the O&D passenger forecast for the domestic short-haul market segment the following approach was used:

1. Through an econometric modeling approach, the historic domestic short-haul O&D passenger traffic development to the SCAG region airports, including the airports of San Diego, Carlsbad and Santa Barbara, has been related to historic development of various socio-economic variables such as the economic growth in the region, population, per capita incomes, fare levels, crude oil prices and others.
2. A regression analysis has been performed to identify the variables that have the strongest correlation with the historic traffic development. The regression analysis identified the real Gross Regional Product of the short-haul markets in combination with fares as reliable predictors of short-haul domestic passenger traffic between 1990 and 2013. The regression analysis produced an  $R^2$  value of 0.90. **FIGURE 8** shows the excellent fit of the values generated by the regression model in comparison with actual historic traffic levels. The model is therefore deemed to be a reliable predictor of future O&D traffic to short-haul domestic markets.
3. The final model for Domestic Short-Haul O&D traffic can be described by the following equation:

**FIGURE 8** Goodness-of-fit Domestic Short-Haul Traffic Model



$\ln(\text{Domestic Short-Haul Traffic}) = c_1 + c_2 * \ln(\text{Real Domestic Short-Haul GDP}) + c_3 * \ln(\text{Real Domestic Short-Haul Fares}) + c_4 * \text{dummyGulf War} + c_5 * \text{dummy9/11} + c_6 * \text{dummyGlobal Financial Crisis}$  where:

- Ln is the natural log of the variable
- Domestic Short-Haul Traffic is O&D traffic to domestic short-haul markets
- Real Domestic Short-Haul GDP is the Gross Regional Product of domestic short-haul markets adjusted for inflation
- Real Domestic Short-Haul Fares are the fares to domestic short-haul markets in real U.S. dollars
- DummyGulf War is a binary variable that takes on the value 1 in 1991 and 1992 and is 0 otherwise to represent the temporary impact of the Gulf War on traffic;
- Dummy9/11 is a binary variable that takes on the value 1 in 2002 and 2003 and is 0 otherwise to represent the immediate impact of the September 11th events on traffic;
- DummyGlobal Financial Crisis is a binary variable that takes on the value 1 in 2009 and 2010 and is 0 otherwise to represent the impact of the global financial crisis on traffic;
- $c_1$ ,  $c_2$ ,  $c_3$ ,  $c_4$ ,  $c_5$ , and  $c_6$  are the estimated model parameters capturing the impact of various factors on domestic short-haul traffic growth

The econometric model describing domestic short-haul traffic resulted in the following values for the dominant parameters, or elasticities:

- GDP elasticity of 0.20
  - Air Fare coefficient of -0.70
4. Using forecasts of the Real Gross Regional Product of the short-haul markets and a forecast of real air fares, future forecast levels could be generated.

## DOMESTIC MEDIUM-TO LONG-HAUL O&D TRAFFIC

To prepare the O&D passenger forecast for the domestic medium- to long-haul markets the following approach was used:

1. Through an econometric modeling approach, the historic domestic medium- to long-haul O&D passenger traffic development to the SCAG region airports, including the airports of San Diego, Carlsbad and Santa Barbara, has been related to historic development of various socio-economic variables such as the economic growth in the region, population, per capita incomes, fare levels, crude oil prices and others.

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- A regression analysis has been performed to identify the variables that have the strongest correlation with the historic traffic development. The real Gross Regional Product of the combined medium- and long-haul markets, in combination with fares, show the best fit with the historic passenger traffic development between 1990 and 2013. The regression analysis produced an  $R^2$  value of 0.97. **FIGURE 9** shows the excellent fit of the values generated by the regression model in comparison with actual historic traffic levels. The model is therefore deemed to be a reliable predictor of future O&D traffic to domestic medium- to long-haul markets.
- The final model for Medium- to Long-Haul Domestic O&D traffic can be described by the following equation:

**$\text{Ln}(\text{Domestic Medium- to Long-Haul Traffic}) = c1 + c2 * \text{Ln}(\text{Real Domestic Medium- to Long-Haul GDP}) + c3 * \text{Ln}(\text{Real Domestic Medium- to Long-Haul Fares}) + c4 * \text{dummy9/11} + c5 * \text{dummyGlobal Financial Crisis}$**  where:

- Ln is the natural log of the variable
- Domestic Medium- to Long-Haul Traffic is O&D traffic to domestic medium- to long-haul markets
- Real Domestic Medium- to Long-Haul GDP is the Gross Regional Product of domestic medium- to long-haul markets adjusted for inflation
- Real Domestic Medium- to Long-Haul Fares are the fares to domestic medium- to long-haul markets in real U.S. dollars

- Dummy9/11 is a binary variable that takes on the value 1 in 2002 and 2003 and is 0 otherwise to represent the immediate impact of the September 11th events on traffic;
- DummyGlobal Financial Crisis is a binary variable that takes on the value 1 in 2009 and 2010 and is 0 otherwise to represent the impact of the global financial crisis on traffic;
- c1, c2, c3, c4, and c5 are the estimated model parameters capturing the impact of various factors on domestic medium- to long-haul traffic growth

The econometric model describing domestic medium- to long-haul traffic resulted in the following values for the dominant parameters, or elasticities:

- GDP elasticity of 0.65
  - Air Fare coefficient of -0.25
- Using forecasts of the Real Gross Regional Product of the medium- to long-haul markets and a forecast of real air fares, future forecast levels could be generated.

## INTERNATIONAL O&D TRAFFIC

Similar to the domestic O&D market, the international O&D market has also been divided into different market segments, based on the characteristics and dynamics of each market, such as geography and length of flight. By analyzing historic O&D traffic levels, air passenger traffic to the region was divided in terms of the key international market segments.

- Asia and Oceania
- Canada and Greenland
- Mexico, Central America and the Caribbean
- South America
- Trans-Atlantic (Africa, Europe and the Middle East)

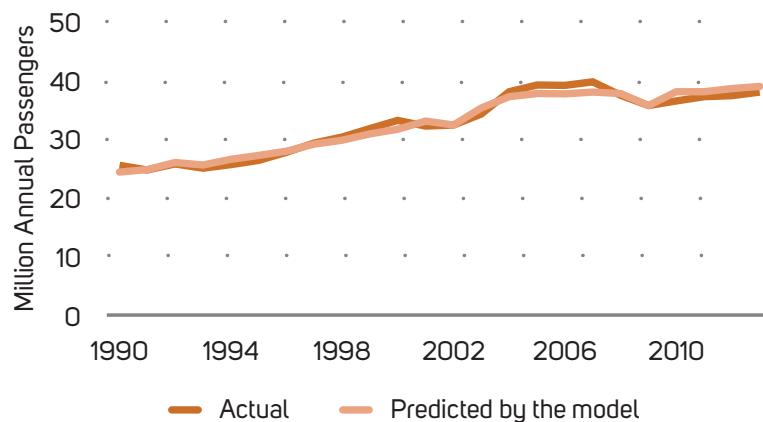
The following sections elaborate on the forecast methodology that was used for each international market segment.

## ASIA/OCEANIA O&D MARKET

To prepare the O&D passenger forecast for the Asia/Oceania O&D market, the following approach was used:

- Through an econometric modeling approach, the historic Asia/Oceania O&D passenger traffic development to the SCAG region airports, including the airports of

**FIGURE 9** Goodness-of-fit Medium- to Long-Haul Domestic Traffic Model





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San Diego, Carlsbad and Santa Barbara, has been related to historic development of various socio-economic variables such as the economic growth in the region, population, per capita incomes, fare levels, crude oil prices and others.

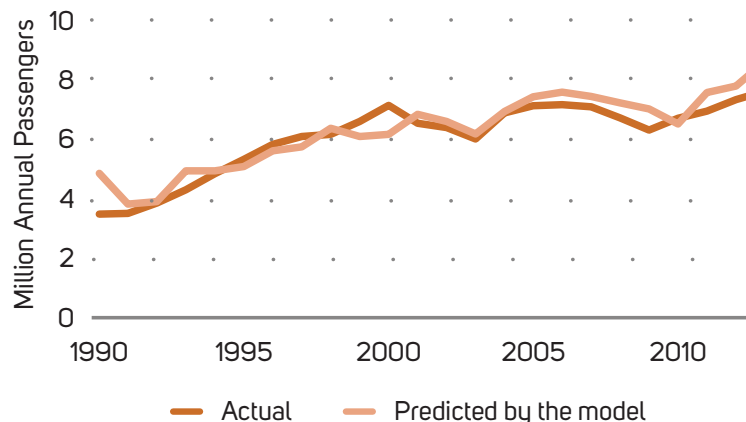
2. A regression analysis has been performed to identify the variables that have the strongest correlation with the historic traffic development. The real Gross Domestic Product of the Asia and Oceania markets, in combination with fares, show the best fit with the historic passenger traffic development between 1990 and 2013. The regression analysis produced an  $R^2$  value of 0.86. **FIGURE 10** shows the excellent fit of the values generated by the regression model in comparison with actual historic traffic levels. The model is therefore deemed to be a reliable predictor of future O&D traffic to Asia and Oceania.
3. The final model for Asia/Oceania O&D traffic can be described by the following equation:

$\text{Ln}(\text{Asia/Oceania Traffic}) = c_1 + c_2 * \text{Ln}(\text{Real Asia/Oceania GDP}) + c_3 * \text{Ln}(\text{Real Asia/Oceania Fares}) + c_4 * \text{dummy9/11} + c_5 * \text{dummyGlobal Financial Crisis} + c_6 * \text{dummySARS}$  where:

- Ln is the natural log of the variable
- Domestic Asia/Oceania Traffic is O&D traffic to Asia/Oceania
- Real Asia/Oceania GDP is the Gross Domestic Product of Asia/Oceania adjusted for inflation
- Real Asia/Oceania Fares are the fares to Asia and Oceania markets in real U.S. dollars

- Dummy9/11 is a binary variable that takes on the value 1 in 2002 and 2003 and is 0 otherwise to represent the immediate impact of the September 11th events on traffic;
  - DummyGlobal Financial Crisis is a binary variable that takes on the value 1 in 2009 and 2010 and is 0 otherwise to represent the impact of the global financial crisis on traffic;
  - DummySARS is a binary variable that takes on the value 1 in 2003 and is 0 otherwise to reflect the impact of SARS (Severe Acute Respiratory Syndrome) on traffic;
  - $c_1, c_2, c_3, c_4, c_5,$  and  $c_6$  are the estimated model parameters capturing the impact of various factors on Asia/Oceania traffic growth
  - The econometric model describing Asia/Oceania O&D traffic resulted in the following values for the dominant parameters, or elasticities:
    - GDP elasticity of 0.38
    - Air Fare coefficient of -0.96
4. Using forecasts of the Real Gross Domestic Product of Asia and Oceania and a forecast of real air fares, future forecast levels could be generated.

**FIGURE 10** Goodness-of-fit Asia/Oceania Traffic Model



## CANADA/GREENLAND O&D MARKET

To prepare the O&D passenger forecast for the Canada/Greenland O&D market the following approach was used:

1. Through an econometric modeling approach, the historic Canada/Greenland O&D passenger traffic development to the SCAG region airports, including the airports of San Diego, Carlsbad and Santa Barbara, has been related to historic development of various socio-economic variables such as the economic growth in the region, population, per capita incomes, fare levels, crude oil prices and others.
2. A regression analysis has been performed to identify the variables that have the strongest correlation with the historic traffic development. The real Gross Regional Product of the California, in combination with fares, show the best fit with the historic passenger traffic development between 1990 and 2013. The regression analysis produced an  $R^2$  value of 0.95. **FIGURE 11** shows the excellent fit of the values generated by the regression model in comparison with actual historic traffic levels. The model is therefore deemed to be a reliable predictor of future O&D traffic to Canada and Greenland.
3. The final model for Canada/Greenland O&D traffic can be described by the following equation:

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$\text{Ln}(\text{Canada/Greenland Traffic}) = c_1 + c_2 * \text{Ln}(\text{Real California GDP}) + c_3 * \text{Ln}(\text{Real Canada/Greenland Fares}) + c_4 * \text{dummy9/11} + c_5 * \text{dummyGlobal Financial Crisis}$  where:

- Ln is the natural log of the variable
- Domestic Canada/Greenland Traffic is O&D traffic to Canada/Greenland
- Real Canada/Greenland GDP is the Gross Domestic Product of California adjusted for inflation
- Real Canada/Greenland Fares are the fares to Canada and Greenland markets in real U.S. dollars
- Dummy9/11 is a binary variable that takes on the value 1 in 2002 and 2003 and is 0 otherwise to represent the immediate impact of the September 11th events on traffic;
- DummyGlobal Financial Crisis is a binary variable that takes on the value 1 in 2009 and 2010 and is 0 otherwise to represent the impact of the global financial crisis on traffic;
- $c_1$ ,  $c_2$ ,  $c_3$ ,  $c_4$ , and  $c_5$  are the estimated model parameters capturing the impact of various factors on Canada/Greenland traffic growth

The econometric model describing Canada/Greenland O&D traffic resulted in the following values for the dominant parameters, or elasticities:

- GDP elasticity of 0.54
- Air Fare coefficient of -0.91

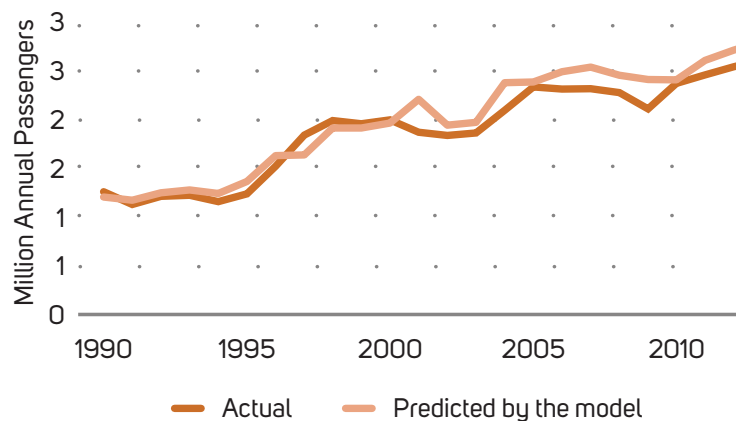
4. Using forecasts of the Real Gross Domestic Product of Canada and Greenland and a forecast of real air fares, future forecast levels could be generated.

### MEXICO/CENTRAL AMERICA/CARIBBEAN O&D MARKET

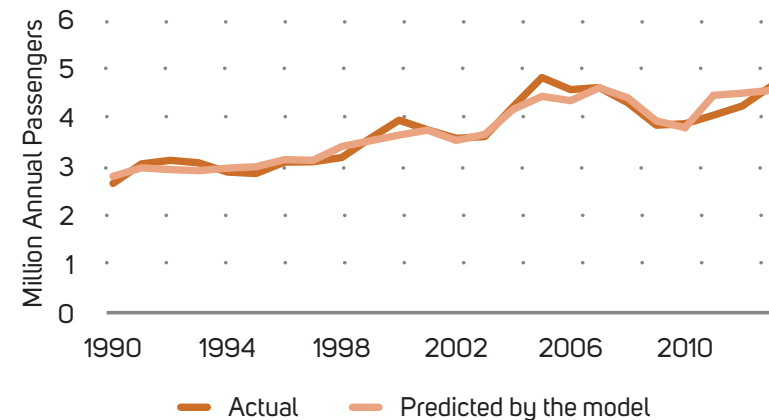
To prepare the O&D passenger forecast for the Mexico/Central America/Caribbean O&D market the following approach was used:

1. Through an econometric modeling approach, the historic Mexico/Central America/Caribbean O&D passenger traffic development to the SCAG region airports, including the airports of San Diego, Carlsbad and Santa Barbara, has been related to historic development of various socio-economic variables such as the economic growth in the region, population, per capita incomes, fare levels, crude oil prices and others.
2. A regression analysis has been performed to identify the variables that have the strongest correlation with the historic traffic development. The real Gross Regional Product of the California, in combination with fares, show the best fit with the historic passenger traffic development between 1990 and 2013. The regression analysis produced an  $R^2$  value of 0.93. **FIGURE 12** shows the excellent fit of the values generated by the regression model in comparison with actual historic traffic

**FIGURE 11** Goodness-of-fit Canada/Greenland Traffic Model



**FIGURE 12** Goodness-of-fit Mexico/Central America/Caribbean Traffic Model



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levels. The model is therefore deemed to be a reliable predictor of future O&D traffic to Mexico, Central America, and the Caribbean.

- The final model for Mexico/Central America/Caribbean O&D traffic can be described by the following equation:

$\text{Ln}(\text{Mexico/Central America/Caribbean Traffic}) = c1 + c2 * \text{Ln}(\text{Real California GDP}) + c3 * \text{Ln}(\text{Real Mexico/Central America/Caribbean Fares}) + c4 * \text{dummy9/11} + c5 * \text{dummyGlobal Financial Crisis}$  where:

- Ln is the natural log of the variable
- Domestic Mexico/Central America/Caribbean Traffic is O&D traffic to Mexico/Central America/Caribbean
- Real Mexico/Central America/Caribbean GDP is the Gross Domestic Product of California adjusted for inflation
- Real Mexico/Central America/Caribbean Fares are the fares to Canada and Greenland markets in real U.S. dollars
- Dummy9/11 is a binary variable that takes on the value 1 in 2002 and 2003 and is 0 otherwise to represent the immediate impact of the September 11th events on traffic;
- DummyGlobal Financial Crisis is a binary variable that takes on the value 1 in 2009 and 2010 and is 0 otherwise to represent the impact of the global financial crisis on traffic;

- c1, c2, c3, c4, and c5 are the estimated model parameters capturing the impact of various factors on Mexico/Central America/Caribbean traffic growth

The econometric model describing Mexico/Central America/Caribbean O&D traffic resulted in the following values for the dominant parameters, or elasticities:

- GDP elasticity of 0.48
  - Air Fare coefficient of -0.64
- Using forecasts of the Real Gross Domestic Product of Mexico, Central America, and the Caribbean and a forecast of real air fares, future forecast levels could be generated.

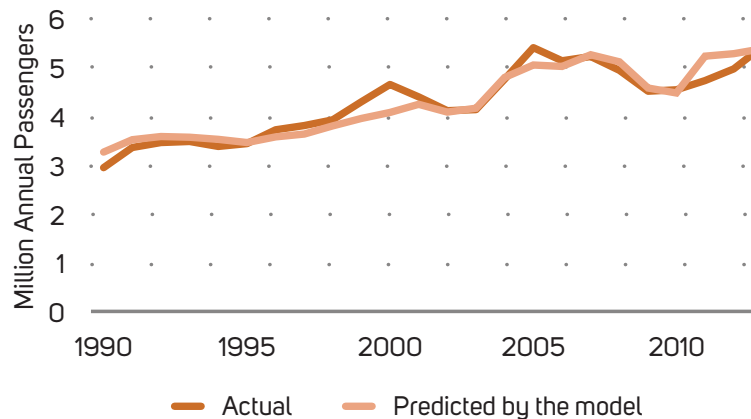
### SOUTH AMERICA O&D MARKET

While O&D traffic to South America has shown robust growth rates over the past decades, the traffic volumes are still too modest to produce meaningful and reliable macro-economic models. Since a significant share of O&D traffic to South America flows through one of the hubs in Central America, such as Panama or Mexico City, O&D traffic to South America will be influenced by the available capacity to Mexico and Central America. The South America market is therefore combined with the Mexico/Central America/Caribbean market into an aggregate Latin America market segment.

To prepare the O&D passenger forecast for the South America O&D market the following approach was used:

- Through an econometric modeling approach, the historic Latin America O&D passenger traffic development to the SCAG region airports, including the airports of San Diego, Carlsbad and Santa Barbara, has been related to historic development of various socio-economic variables such as the economic growth in the region, population, per capita incomes, fare levels, crude oil prices and others.
- A regression analysis has been performed to identify the variables that have the strongest correlation with the historic traffic development. The real Gross Domestic Product of the Latin America countries, in combination with fares, show the best fit with the historic passenger traffic development between 1990 and 2013. The regression analysis produced an  $R^2$  value of 0.90. **FIGURE 13** shows the excellent fit of the values generated by the regression model in comparison with actual historic traffic levels. The model is therefore deemed to be a reliable predictor of future O&D traffic to Latin America.
- The final model for Latin America O&D traffic can be described by the following equation:

**FIGURE 13** Goodness-of-fit Latin America Traffic Model



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$\text{Ln}(\text{Latin America Traffic}) = c1 + c2 * \text{Ln}(\text{Real Latin America GDP}) + c3 * \text{Ln}(\text{Real Latin America Fares}) + c4 * \text{dummy9/11} + c5 * \text{dummyGlobal Financial Crisis}$  where:

- Ln is the natural log of the variable
- Domestic Latin America Traffic is O&D traffic to Latin America
- Real Latin America GDP is the Gross Domestic Product of the Latin American countries adjusted for inflation
- Real Latin America Fares are the fares to Canada and Greenland markets in real U.S. dollars
- Dummy9/11 is a binary variable that takes on the value 1 in 2002 and 2003 and is 0 otherwise to represent the immediate impact of the September 11th events on traffic;
- DummyGlobal Financial Crisis is a binary variable that takes on the value 1 in 2009 and 2010 and is 0 otherwise to represent the impact of the global financial crisis on traffic;
- c1, c2, c3, c4, and c5 are the estimated model parameters capturing the impact of various factors on Latin America traffic growth

The econometric model describing Latin America O&D traffic resulted in the following values for the dominant parameters, or elasticities:

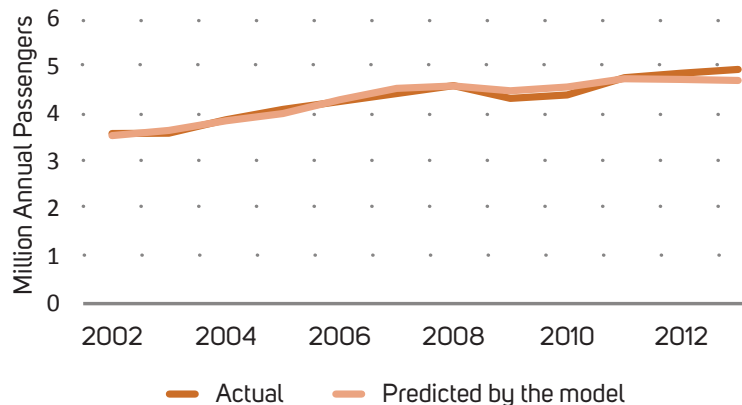
- GDP elasticity of 0.46
  - Air Fare coefficient of -0.54
4. Using forecasts of the Real Gross Domestic Product of Mexico, Central America and the Caribbean and a forecast of real air fares, future forecast levels could be generated.
  5. Apply the growth rates of the resulting Latin America traffic model to the actual South America O&D traffic levels

## TRANS-ATLANTIC O&D MARKET

To prepare the O&D passenger forecast for the Trans-Atlantic O&D market the following approach was used:

1. Through an econometric modeling approach, the historic Trans-Atlantic O&D passenger traffic development to the SCAG region airports, including the airports of San Diego, Carlsbad and Santa Barbara, has been related to historic development of various socio-economic variables such as the economic growth in the region, population, per capita incomes, fare levels, crude oil prices and others.
2. A regression analysis has been performed to identify the variables that have the strongest correlation with the historic traffic development. The real Gross Domestic Product of Europe, in combination with fares, show the best fit with the historic passenger traffic development between 2002 and 2013. The regression analysis produced an  $R^2$  value of 0.94. **FIGURE 14** shows the excellent fit of the values generated by the regression model in comparison with actual historic traffic levels. The model is therefore deemed to be a reliable predictor of future O&D traffic to the Trans-Atlantic markets.
3. The final model for Trans-Atlantic O&D traffic can be described by the following equation:  $\text{Ln}(\text{Trans-Atlantic Traffic}) = c1 + c2 * \text{Ln}(\text{Real Europe GDP}) + c3 * \text{Ln}(\text{Real Trans-Atlantic Fares})$  where:
  - Ln is the natural log of the variable
  - Domestic Trans-Atlantic Traffic is O&D traffic to Africa, Europe and the Middle East
  - Real Trans-Atlantic GDP is the Gross Domestic Product of Europe adjusted for inflation
  - Real Trans-Atlantic Fares are the fares to Africa, Europe, and the Middle East markets in real U.S. dollars
  - c1, c2, and c3 the estimated model parameters capturing the impact of various factors on Trans-Atlantic traffic growth

**FIGURE 14** Goodness-of-fit Trans-Atlantic Traffic Model



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The econometric model describing Trans-Atlantic O&D traffic resulted in the following values for the dominant parameters, or elasticities:

- GDP elasticity of 2.28
- Air Fare coefficient of -0.20

As the Trans-Atlantic market matures and gradually reaches saturation, the GDP parameter will decline to a value of 1.0 in 2040 reflecting the maturity of the local air transport market. As the forecast years progress, gradually decreasing elasticities of demand were therefore applied so that the long-term forecast accurately reflects the growing maturity of the Trans-Atlantic market. Finally, after applying the elasticities to generate passenger forecasts, the forecasts were critically reviewed for reasonableness and validated against the projections of independent industry regional forecasts, such as those prepared by Boeing and Airbus. Based on these comparisons, adjustments to the year-over-year passenger growth rates were made as necessary.

- Using forecasts of the Real Gross Domestic Product of Europe and a forecast of real air fares, future forecast levels could be generated.

### REGIONAL AIR PASSENGER DEMAND FORECAST RESULTS

Based on the methodology described above, forecast O&D passenger demand in the SCAG region is forecast to increase from 72.6 MAP in 2013 to 112.2 MAP in 2040. This rate of

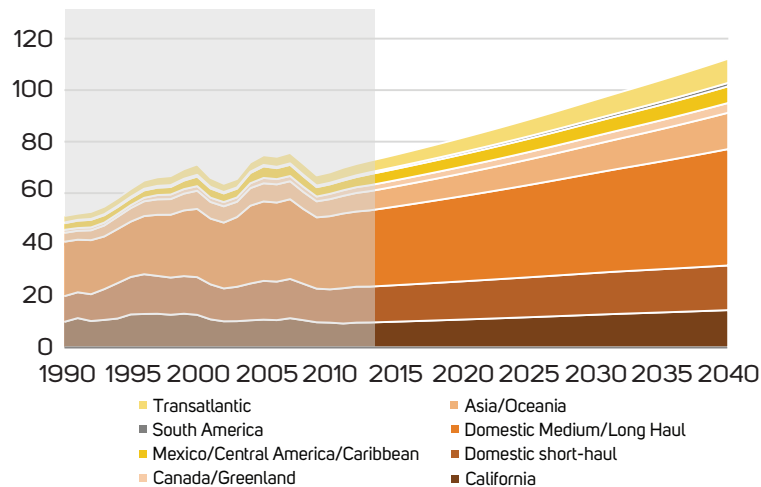
growth is equivalent to a compound annual growth rate of 1.6 percent. As shown in **FIGURE 15**, the U.S. domestic market remains the largest segment of demand, constituting nearly 70 percent of the market in 2040. Despite the continued dominance of the U.S. market, the demand for international travel to and from the region increases at a slightly higher rate over the forecast period.

Forecast total enplaned and deplaned passenger demand in the SCAG region is forecast to increase from 88.0 MAP in 2013 to 136.2 MAP in 2040. As shown in **FIGURE 16**, the share of connecting passengers is forecast to remain stable at about 17 percent. The forecast of 136.2 million E/D passengers and 112.2 million O&D passengers by 2040 represents a slower growth rate than anticipated in previous RTP documents. Below are the forecasts of total E/D passengers from the previous 5 RTPs:

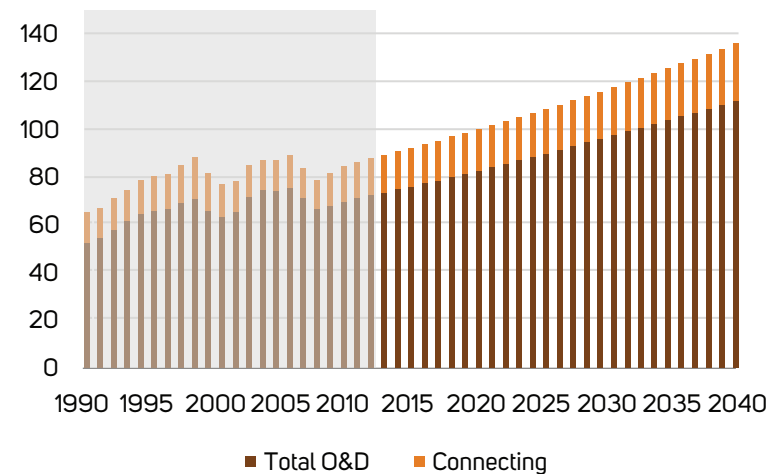
- 1998 RTP—157.4 MAP in 2020
- 2001 RTP—167 MAP in 2025
- 2004 RTP—170 MAP in 2030
- 2008 RTP—165.3 MAP in 2035
- 2012-2035 RTP/SCS—145.9 MAP in 2035 (Baseline Scenario)

Through 2014, actual air passenger demand has been considerably below the trend lines predicted by prior forecasts. The declines in air travel resulting from the terrorist attacks of 2001, the bursting of the tech bubble in 2001 and the global financial crisis of 2007-2008,

**FIGURE 15** Forecast O&D Passenger Demand



**FIGURE 16** Forecast Total Enplaned and Deplaned Passengers



and the ensuing recessions could not have been forecast. Although annual growth in air travel may exceed the currently forecast rate of 1.6 percent in some of the years ahead, there will almost certainly be other worldwide economic and geopolitical events between now and 2040 that will temper the overall growth rate. The forecast average growth in air travel of 1.6 percent per year is based on the same regional socioeconomic forecasts used elsewhere in this RTP/SCS.

## AIRPORT DEMAND FORECASTS

The previous sections described the methodology used to forecast passenger traffic to the SCAG region as a whole. In the next step, this regional air passenger traffic has to be allocated to the individual airports in the SCAG region. The air passenger demand handled by each airport in the region depends on passengers' choices regarding which airport to use, as well as physical and policy constraints that may limit an airport's ability to accommodate the demand. As discussed below, passengers' choices regarding which airport to use are themselves constrained by airlines' decisions concerning which airports to serve. The following subsections discuss these factors and the resulting forecast passenger demand at each airport in the region.

## AIR TRAFFIC ALLOCATION MODEL

A traveler's decision to use a particular airport to begin or end a journey depends on a number of factors. The drive time required to reach the airport, the level of air service in terms of the number of frequencies and destinations that are offered, the airline portfolio, as well as other less quantifiable factors, such as convenience and past experiences, also influence the passenger's choice.

The methodology to allocation traffic across the individual airports is presented in [EXHIBIT 3](#). Before traffic can be allocated across the various airports, an assessment must be made concerning how much passenger traffic each subregion within the SCAG region generates. For each of the subregions, an estimate has been made of what share it generated of the total air passenger traffic in the region in 2012. The traffic-generating ability of each subregion can be expressed through a wealth-, or income-adjusted population size, where the population size of each region is either discounted or increased by the ratio between the average household income of that particular subregion divided by the average household income of the entire region. The amount of passenger traffic handled by all the airports in the region is then allocated proportionally based on the wealth-adjusted population calculated for each subregion.

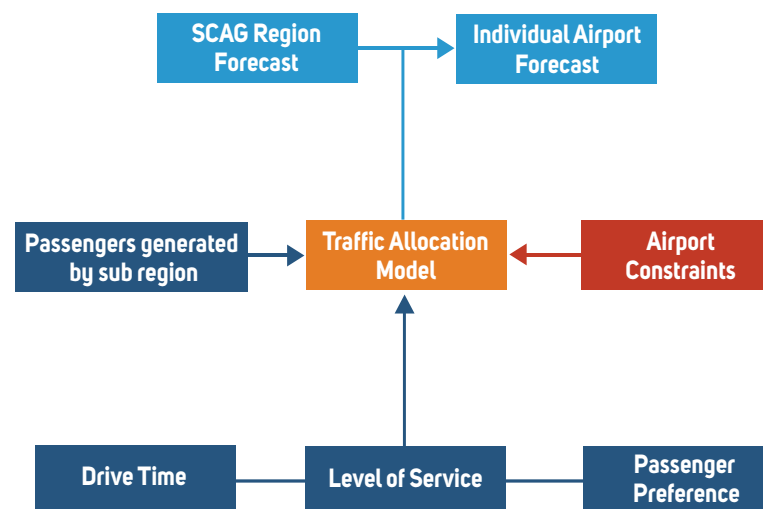
With the amount of traffic generated by each subregion estimated, the next step is to allocate traffic across the various airports. As mentioned earlier, this is primarily a function of access time, level of airline service, and general passenger preferences.

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These factors are discussed below:

- **DRIVE TIME:** Access time to an airport is an important factor driving the decision of a traveler to use a particular airport; to minimize total trip time, people typically have a preference for nearby airports. By using geographic information system software, the size of the population living within a certain drive time of the airport can be calculated. For each airport in the region, the population size within a 30-minute, 60-minute, and 90-minute drive time has been calculated. The results are compiled into a single catchment area population size, in which the number of people living within a 60-minute and 90-minute drive are discounted to reflect the fact that the attractiveness of an airport decreases with drive time. Based on the total number of people living in the overall catchment area, each airport receives a score to represent its attractiveness to travelers from each sub region in terms of drive time.
- **LEVEL OF AIRLINE SERVICE:** Another important criterion influencing a passenger's choice is the level of service that is offered at the particular airport. This is mainly determined by the airline and destination portfolio as well as the number of frequencies that are offered. Based upon these factors, each airport received a level of service score.
- **PASSENGER PREFERENCE:** In addition to access time and level of service, the passenger's choice to use a certain airport is also driven by less quantifiable and subjective factors, such as past experiences and perceived convenience.

### EXHIBIT 3 Air Traffic Allocation Model



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For airports with existing service passenger preference was based on historic passenger enplanements. These factors are combined into an overall passenger preference score that represent the attractiveness of each airport to travelers from each sub region.

The individual scores of each decision factor are combined into an overall score for each airport. Based on the overall score that each airport received for a particular airport, the amount of traffic that each region generates is allocated proportionally to each airport. The airport scores are calibrated until the outcome for each airport matches the actual passenger numbers of 2012. Finally, the results are validated by comparing them with passenger surveys, where available, of the origin of a sample set of passengers. By applying this allocation mechanism to the passenger forecast developed for the entire region, passenger traffic can be distributed over the individual airports through 2040.

The resulting allocations represent the unconstrained demand case, i.e., where passenger traffic at each airport can develop unimpeded and is not hindered by any physical capacity constraints or policy constraints. In reality, however, a number of airports in the region will face capacity constraints within the forecast horizon. Since there are a number of different paths along which airport development might proceed as a result of different constraints, the capacity restrictions are input to the scenario development described in the next section.

### CAPACITY CONSTRAINTS

Four of the commercial airports in urban areas of the region face physical or policy constraints that may limit their capacity to accommodate increases in demand by 2040. Therefore, these constraints were analyzed to develop a range of plausible scenarios for the development of air traffic allocation in the region. The airports at which constraints were analyzed are as follows:

- Burbank Bob Hope Airport
- Los Angeles International Airport
- Long Beach Airport
- John Wayne Airport

At each airport, planning-level analyses of the capacities of the airfield and the terminals were conducted. The long-term configurations of the airfield and terminal at each airport were identified from Airport Master Plans and similar studies. Policy constraints were also reviewed. The overall airport capacity is the minimum of the constraints imposed by the airfield, the terminal, and policy considerations.

The following methodologies were used for the review of the airfield and terminal capacity limits:

**AIRFIELD CAPACITY:** Based on the ultimate airport layout plan from each airport with the feasible ultimate runway configuration, the hourly capacity and annual service volume (ASV) of the airfield were estimated in terms of aircraft operations utilizing processes and formulas prescribed in FAA Advisory Circular 150/5060-5, "Airport Capacity and Delay." The percentage of commercial operations, load factor and seating capacity were then estimated from historical data and anticipated future trends. The ASV, percentage of commercial operations, and occupied seats per plane yield the estimated maximum annual passenger volume.

**TERMINAL CAPACITY:** Based on the ultimate airport layout plan from each airport, the feasible ultimate terminal gate (active and remote) configuration was identified. Historic gate utilization data was analyzed (e.g., design day schedule and gate chart, average number of turns per gate, fleet mix, seating capacity) to estimate the maximum gate capacity by maximizing the usage of each gate in the ultimate terminal layout plan.

A series of sensitivity analyses were conducted around the airfield and terminal capacities. In these sensitivity analyses, input assumptions were varied to develop a range of possible capacity limits for each airport.

The following sections summarize the analysis at each of the four constrained urban airports.

### BURBANK BOB HOPE AIRPORT

Burbank Airport staff reported that the airport's airfield was limited to a practical capacity of 50 operations per hour based on the runway configuration and airspace conflicts with Van Nuys Airport to the west. In recent years, 50 percent of operations have been commercial operations, 75 percent of which have been scheduled air carriers. Based on historic load factors, these conditions yield an airfield capacity of approximately 7.3 MAP. Sensitivity analyses varying the mix of operations and load factors produced some scenarios with higher ASV and airfield capacity, but 7.3 MAP was the most reasonable estimate of airfield capacity based on their knowledge of the operations of the airport.

The existing airport terminal includes 14 air carrier gates. A proposed replacement terminal now in the planning stages would also have 14 gates. All 14 gates of the existing and proposed replacement terminals are designated for airplane design group (ADG) III aircraft, such as a Boeing 737. Since the airport uses ramps and stairways to load from the front and the back of aircraft, airport staff indicated that each gate can handle up to 15 arrivals and departures per day. Based on the anticipated use of larger aircraft within ADG III in the future, the 14-gate terminal arrangement would have a maximum capacity of approximately 12 MAP.

Burbank Airport currently imposes a voluntary nighttime curfew. However, it is not legally

enforceable and does not affect the overall capacity of the airport. Therefore, the overall capacity of Burbank Airport is 7.3 MAP.

## LOS ANGELES INTERNATIONAL AIRPORT (LAX)

LAX has a complex runway system that can be utilized in several alternative configurations. The runway system consists of two sets of dual parallel runways. The north runway complex consists of Runways 6L-24R (8,925 feet long and 150 feet wide), and 6R-24L (10,285 feet long and 150 feet wide). There is 700 feet runway centerline-to-centerline separation between the north complex runways. The close separation of the two parallel north runways precludes independent operations during weather conditions where cloud ceilings are less than 1,000 feet and visibility is less than 3 miles. Each end of Runways 6R-24L and 6L-24R is equipped with Category I instrument landing systems. Runway 6R-24L is primarily used for departing aircraft, and Runway 6L-24R is primarily used for arriving aircraft.

The south runway complex consists of Runways 7L-25R (12,091 feet long and 150 feet wide), and 7R-25L (11,095 feet long and 200 feet wide). The separation between these two runways is 800 feet. Each end of Runway 7L-25R and Runway 7R is equipped with Category I instrument landing systems. Runway 25L is equipped with a Category IIIB instrument landing system. Runway 7L-25R is used primarily for departing aircraft. Runway 7R-25L is used primarily for arriving aircraft. The separation between runway 6R-24L and runway 7L-25R is more than 4,500 feet, which allows for independent operations.

The LAX airfield capacity was estimated based on the runway configuration as described in the LAX Specific Plan Amendment Study (SPAS), which identified four basic runway operating configurations:

- Visual flight rules (VFR) with visual approaches – West Flow (currently occurs 69.2 percent of the time)
- VFR with simultaneous instrument landing (ILS) approaches – West Flow (occurs 24.6 percent of the time)
- Instrument meteorological conditions (IMC)/Instrument flight rules (IFR) with instrument approaches – West Flow (occurs 4.1 percent of the time)
- VFR with simultaneous ILS approaches – East Flow (occurs 2.1 percent of the time)

The analysis of LAX's airfield capacity included estimation of hourly capacity and ASV from six sensitivity tests that varied in their assumptions about the percentage of time that the runway system is operated in each of the configurations described above, and based on airside simulations from previous studies as well as the FAA Airport Capacity Benchmark Report 2004. The range of sensitivity tests was then applied to three scenarios that varied

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in terms of the percentage of aircraft operations that would be by scheduled carriers, commuter carriers, and charter carriers, using aircraft of different sizes and with varying load factors. Each scenario was then subjected to six sensitivity tests that varied in their assumptions about the percentage of time that the runway system is operated in each of the configurations described above. The scenarios and sensitivity tests yielded a range of airfield capacities from 82.9 MAP to 96.6 MAP. This range is not a projection of demand for a future year, but an estimate of how many passengers the airfield (according to approved plans) could accommodate.

The LAX Master Plan and SPAS include a limit of a total of 153 gates at all terminals at LAX. However, in different scenarios, some gates may be designed for different airplane design group classifications. In addition, gates that are used for larger design groups will be able to handle fewer arrivals and departures each day. Therefore, a variety of terminal configurations were analyzed that varied with regard to their assumptions about the distribution of gate designs. The resulting estimates of the overall terminal capacity range from 85 to 104 MAP.

LAX is subject to a court sanctioned settlement agreement until 2020. Consistent with that settlement agreement, the SPAS was prepared to “plan for the modernization and improvement of LAX in a manner that is designed for a practical capacity of 78.9” MAP. After 2020, barring further court action, there is no enforceable cap on the number of gates or total annual passenger volume at LAX. Therefore, the capacity of LAX is in the range of 82.9 MAP to 96.6 MAP, limited by the airfield, based on the runway configuration described above and as in the SPAS. Alternative runway configurations (e.g., Alternate A or B in the LAX Master Plan) could yield higher airfield capacities.

## LONG BEACH AIRPORT

Long Beach Airport has two sets of parallel runways forming a square and a fifth, diagonal runway crossing all four of the other runways. However, only the diagonal runway (runway 12/30) is used for commercial operations. Therefore, the estimate of airfield capacity in terms of annual passenger volume was based on a one-runway system for commercial operations. A series of scenarios crossed with sensitivity tests varying in assumptions about fleet mix and runway operations was conducted for Long Beach Airport, similar to the analyses conducted for the other airports.

Long Beach Airport, however, is subject to a noise compatibility ordinance that in practice limits the airport to 41 commercial and 25 commuter departures per day. (The 41 commercial flight limit may only be exceeded if the City of Long Beach determines that the additional flights will not exceed the “noise budget” limits based on the baseline year of 1989-90.) A commuter flight is defined as one completed by an airplane with a maximum take-off weight of less than 75,000 pounds. Based on the anticipated use of larger aircraft within



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ADG III in the future (having an average of 162 seats) and current load factors, 41 commercial flights could potentially accommodate 4.0 MAP. Commuter service with a typical regional jet having 66 seats could accommodate another 1.0 MAP, at current load factors. Therefore, the noise compatibility ordinance imposes a practical limit of 5.0 MAP at Long Beach Airport. This limit is also below the capacity of the airport's terminal and airfield. It is anticipated that the City of Long Beach will soon allow an additional 9 commercial departures per day based on the terms of the ordinance (for a total of 50 daily commercial departures). If the additional departures are able to be utilized the assumptions and capacity analysis results may need to be updated for Long Beach Airport.

### JOHN WAYNE AIRPORT

The runway system at John Wayne Airport consists of two parallel runways. The primary runway 2L/20R is 5,701 feet long, while the secondary runway 2R-20L is only 2,887 feet long. The secondary runway is not equipped for instrument approach procedures. The centerlines of the runways are separated by 500 feet, which does not allow for operation of simultaneous arrivals and departures under visual flight rules (VFR). The short secondary runway offers some operational benefits for smaller aircraft that enhances capacity under VFR conditions. During periods of instrument flight rule (IFR), operations are basically limited to the primary runway, on which the airlines operate.

As with the other airports, a series of scenarios crossed with sensitivity tests varying in assumptions about fleet mix and runway operations was conducted for John Wayne Airport, similar to the analyses conducted for the other airports. The scenarios varied with regard to the percentage of flight operations assumed to be conducted by commercial carriers (from 35 percent to 55 percent). The sensitivity tests varied primarily in the percentage of time that it is assumed the airport can operate under VFR conditions (from 53 percent to 95 percent).

**TABLE 2** Airport Capacity Constraints (MAP, Million Annual Passengers)

| Airport | Constraint  | Source of Constraint                                 |
|---------|-------------|--|
| BUR     | 7.3         | Airfield   |
| LAX     | 82.9 – 96.6 | Airfield   |
| LGB     | 5.0         | Noise compatibility ordinance                        |
| SNA     | 12.5        | Settlement agreement adopted by Board of Supervisors |

The results of the analyses suggest a capacity of the airfield in the range of 9.6 to 18.7 MAP. However, it should be noted that the airport has handled more than 9.6 MAP in the past.

The existing terminal includes twenty air carrier gates with passenger loading bridges and six ground loading gates for commuter aircraft. Thirteen of the twenty gates with passenger loading bridges are ADG IV gates designed to accommodate the Boeing 757, and seven are ADG III gates. While the Boeing 757 is no longer being produced and will likely be retired from airline fleets in the coming years the next versions of typical ADG III aircraft, such as the Boeing 737 MAX 9 and the Airbus A321neo are planned to have approximately 185 seats, comparable with today's typical ADG IV aircraft. Based on the estimated maximum number of operations per gate, average seat capacity for different ADG, and load factors, the existing terminal would have a capacity of approximately 16 MAP.

John Wayne Airport is currently subject to a court sanctioned settlement agreement. The agreement limits the airport to 12.5 MAP (subject to certain conditions) and remains in effect through 2030. However, the Orange County Board of Supervisors has adopted the limit imposed by the settlement agreement, so further action by the Board of Supervisors would be required to modify this limit, even after 2030. Therefore, the limit of 12.5 MAP at John Wayne Airport is considered to extend through the analysis period of the 2016-2040 RTP/SCS. **TABLE 2** summarizes the capacity constraints at the four constrained urban airports.

### FORECAST AIR PASSENGER ALLOCATION SCENARIOS

Since there are a number of different paths along which airport development in the region might proceed, air passenger demand allocations were developed for the region's airports under several three scenarios representing different conditions: a scenario with no constraints on airport capacity, a scenario with a relatively high degree of regionalization of air travel demand, and a scenario with a relatively low degree of regionalization of demand sets of constraints. All airport allocation scenarios incorporate the overall forecast regional air passenger demand of 136.2 MAP in 2040; they differ with respect to how the total demand is spread across the region's airports. The initial scenario represents the unconstrained demand case, i.e., where passenger traffic at the airport can develop unimpeded and is not hindered by any physical capacity constraints or policy constraints. This scenario constitutes a future baseline from which alternative scenarios incorporating various constraints can be developed. The airport allocations in the unconstrained scenario are shown in the third column of **TABLE 3**.

In the unconstrained scenario, the 2040 demand at Los Angeles International Airport and John Wayne Airport exceeds the identified capacities of those airports, and the demand at Long Beach Airport is at the airport's identified capacity. Therefore, since the identified capacity of LAX spans a large range, two alternative scenarios were analyzed that differ

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with respect to the share of demand that is shifted to other airports in the region. In the “Less Regionalization” scenario, LAX is assumed to operate at the high end of its identified capacity, and all other airports can accommodate up to their identified capacities. In addition, it is assumed that all airports in the region capable of handling passenger traffic identify a market niche of at least 200,000 annual passengers (0.2 MAP). The airport allocations in the “Less Regionalization” scenario are shown in the fourth column of **TABLE 3**.

In the “More Regionalization” scenario, LAX is assumed to operate at the low end of its identified capacity, and all other airports can accommodate up to their identified capacities. In addition, it is again assumed that all airports in the region capable of handling passenger traffic identify a market niche of at least 0.2 MAP. The airport allocations in the “More Regionalization” scenario are shown in the last column of **TABLE 3**.

While the “Less Regionalization” and “More Regionalization” scenarios shown in Table 3 were developed based on a range of physical capacities for LAX, many other factors will determine what level of demand each airport in the region will actually serve in 2040. Actions taken by policy makers at multiple levels in the SCAG region can influence the direction of the development of the region’s aviation infrastructure. SCAG’s Transportation

Committee was presented with the Urbanized and Constrained Airport Capacity Analysis,<sup>1</sup> reviewed various scenarios and adopted the forecast ranges shown in the second column of **TABLE 3** on August 6, 2015. In addition, the Transportation Committee approved the total regional demand of 136.2 MAP which represents the middle of the range for the airports that are assigned ranges. The high end of the range represents approximately a 10 percent increase to 149 MAP; the low end of the range represents a 10 percent decrease to 123 MAP.

One of the factors that will influence the direction of the development of the region’s aviation infrastructure is investment in ground access infrastructure, which is discussed in the following section.

### AIRPORT GROUND ACCESS

The ground access network serving the region’s airports is critical to both the aviation system and the ground transportation system. Passengers’ choice of airports is based in part on the travel time to the airport and the convenience of access, so facilitating airport access is essential to the efficient functioning of the aviation system. In addition, airport related ground trips can contribute to local congestion in the vicinity of the airports.

**TABLE 3** 2040 Airport Demand Forecast Scenarios (MAP, Million Annual Passengers)

| Airport      | Adopted     | Unconstrained | Less Regionalization | More Regionalization |
|--------------|-------------|---------------|----------------------|----------------------|
| <b>Total</b> | 136.2       | 136.2         | 136.2                | 136.2                |
| BUR          | 7.3         | 6.3           | 7.3                  | 7.3                  |
| IPL          | 0.2         | 0.2           | 0.2                  | 0.2                  |
| LAX          | 82.9 - 96.6 | 100.7         | 96.6                 | 82.9                 |
| LGB          | 5.0         | 5.0           | 5.0                  | 5.0                  |
| ONT          | 11.0 -19.0  | 7.2           | 10.1                 | 20.0                 |
| OXR          | 0.2         | —             | 0.2                  | 0.2                  |
| PMD          | 0.5 - 2.5   | —             | 0.5                  | 2.5                  |
| PSP          | 3.7         | 3.0           | 3.2                  | 3.7                  |
| RIV          | 0.2         | —             | 0.2                  | 0.2                  |
| SBD          | 0.2 - 1.5   | —             | 0.2                  | 1.5                  |
| SNA          | 12.5        | 13.8          | 12.5                 | 12.5                 |
| VCV          | 0.2         | —             | 0.2                  | 0.2                  |

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In 2012, more than 200,000 air passengers arrived or departed from the region's airports each day. By 2040, this number is expected to increase to more than 330,000. About half of all air passengers in the region are picked up or dropped off at the airport by a friend or relative. Each end of these pick-up/drop-off air trips results in two ground trips: one to the airport followed by one returning from the airport. Therefore, encouraging the use of transit or other shared-ride modes of transportation to the region's airports is especially effective in reducing automobile trips.

SCAG and its regional partners have brought a new focus on improving ground access to the region's airports in recent years. In July 2012, the Metro Board directed its staff to develop a Regional Airport Connectivity Plan (RACP) that addresses transit connections to five Southern California airports: Burbank Bob Hope (BUR), Long Beach (LGB), LA/Ontario International (ONT), Los Angeles International (LAX) and LA/Palmdale Regional (PMD). The RACP was completed in January 2013. In November 2014, San Bernardino Association of Governments (SANBAG) completed its Ontario Airport Rail Access Study. SCAG is currently initiating an L.A. and San Bernardino Inter-County Transit and Rail Connectivity Study, which will continue these prior planning efforts undertaken by Metro and SANBAG.

Airport operators have also undertaken their own initiatives, ranging from planning through implementation, to improve ground access at their facilities. The City of Burbank and the Burbank-Glendale-Pasadena Airport Authority conducted the Bob Hope Airport Area Ground Transportation and Land Use Study to analyze potential transportation and related land use development in the Bob Hope Airport area.

Los Angeles World Airports (LAWA) has been working closely with Metro to improve transit access to LAX. The agency is currently in the environmental review phase of the LAX Landside Access Modernization Program, a series of improvements including an Automated People Mover, a consolidated rental car facility, and two intermodal transportation facilities, one of which will provide direct access to the Metro Crenshaw Line, which is currently under construction.

To continue the current high level of airport ground access planning underway in the region, on October 8, 2015, SCAG's Transportation Committee adopted a conceptual framework for regional aviation ground access to support these ongoing efforts, based on the following principles:

- Advance regionalization of air travel demand
- Continue to support regional and inter-regional projects that facilitate airport ground access (e.g., High-Speed Train, High Desert Corridor)
- Support on-going local planning efforts by
  - Airport operators

- County Transportation Commissions
- Local jurisdictions
- Encourage development and use of transit access to the region's airports
- Encourage use of modes with high average vehicle occupancy (AVO)
- Discourage use of modes that require "deadhead" trips to/from airports (a deadhead trip is a vehicle trip with no traveling passenger in the vehicle, such as when a parent drives an otherwise empty car to an airport to pick up a college student arriving by air for Thanksgiving vacation.)

The following sections describe the recent and planned ground access studies and improvements at each of the region's airports.

### BURBANK AIRPORT (BUR)

Burbank Airport is located on Hollywood Way in the City of Burbank, south and west of Interstate 5. Passenger access to the terminals is currently primarily via Hollywood Way at Thornton Avenue and secondarily via Empire Avenue, west of Hollywood Way. The airport is currently preparing an Environmental Impact Report for the development of a replacement terminal. Vehicular access is expected to remain via Hollywood Way, although it may be relocated to a different location along the roadway. An arterial roadway network surrounds the airport, providing connections from residential areas and to destinations throughout Burbank, North Hollywood, Los Angeles and beyond. The Metrolink Ventura line tracks are located immediately south of the airport, and the Antelope Valley line tracks are located immediately north of the airport. The California High Speed Rail Authority is also planning for a station at Burbank Airport in the future.

Regional freeway access to Burbank Airport is primarily provided by I-5 and SR 134. Regional traffic from the north uses the Hollywood Way interchange on I-5. The I-5 North Improvement Project, currently under construction, will improve regional access from the south with the construction of a new interchange at Empire Avenue.

Burbank Airport is the only airport in the region with a direct rail-to-terminal connection, via the recently completed Regional Intermodal Transportation Center (RITC). The RITC is located on airport property just northwest of the Hollywood Way/Empire Avenue intersection. An elevated moving walkway transports people between the RITC and the airport terminals. The RITC serves multiple modes, including public parking, a consolidated rental car facility, regional bus service and bicycles, as well as commuter rail at the Metrolink Ventura line station. A pedestrian bridge connecting the Metrolink station to the RITC that is currently in design will further facilitate access between the train station and the airport. In addition, a second rail station is currently planned on the Metrolink Antelope Valley line.

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**TABLE 4 BUR Ground Access Projects**

| BUR Ground Access Projects  |
|---|
| <b>Recently Completed Ground Access Projects</b>  |
| Regional Intermodal Transportation Center (Empire Area Transit Center)  |
| Install traffic signal at North Avon Street and Empire Avenue   |
| <b>Ground Access Projects Currently Under Construction (or in Design)</b>   |
| I-5 Empire Project  |
| I-5 North Improvement Project: Add HOV lanes on I-5 (from SR-134 to SR-170)   |
| New Antelope Valley Metrolink Line Station at Hollywood Way/San Fernando Road   |
| Burbank Bob Hope Airport Station Pedestrian Grade Separation and Regional Intermodal Transportation Center Connection |
| <b>Recent and On-going Ground Access Studies</b>  |
| Burbank-Glendale-Pasadena Airport Intermodal Ground Access Link Feasibility Study                                     |
| Vanowen/Empire/Clybourn Railroad Crossing Grade Separation Study Project  |
| BUR Terminal Upgrade Environmental Impact Analysis  |
| <b>2016 RTP Ground Access Projects</b>  |
| 1120004: Metro Red Line Extension to BUR  |
| LA000358: Route 5 from Route 134 to Route 170, add HOV lanes.   |
| <b>2015 FTIP Ground Access Projects</b>   |
| LA000358: I-5 North Improvement Project: Route 5 from Route 134 to Route 170, add HOV lanes.                          |
| LAE0726: Vanowen/Empire/Clybourn Railroad Crossing Grade Separation Study Project                                     |
| LA000789: Burbank-Glendale-Pasadena Airport Intermodal Ground Access Link Feasibility Study                           |

**TABLE 4 BUR Ground Access Projects: Continued**

| BUR Ground Access Projects  |
|---|
| LA000789A: Burbank-Glendale-Pasadena Airport Intermodal Ground Access Link  |
| LAE0396: Construction of Empire Area Transit Center near BUR  |
| LA0G1049: Burbank Bob Hope Airport Station Pedestrian Grade Separation and Regional Intermodal Transportation Center Connection |
| LAF5701: Burbank Traveler Information and Wayfinding System   |

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BurbankBus has recently begun operating all-day bus service between the North Hollywood Metro Red Line Station and the airport, utilizing the RITC. The North Hollywood Station provides connections to the Metro rail system via the Red Line to Union Station and the Metro Orange Line, a dedicated BRT right-of-way servicing the San Fernando Valley.

**TABLE 4** provides a detailed list of the ground access improvements at Burbank Airport completed since the 2012 RTP/SCS, those currently in design or under construction, airport-related ground access improvements included in the 2016 RTP/SCS, and airport-related ground access improvements included in the 2015 FTIP.

## IMPERIAL COUNTY AIRPORT (IPL)

Imperial County Airport is located on Airport Road at Imperial Avenue (State Route 86), which is one of the main north-south throughways in the area. Regional highway access from the east and west utilizes I-8, which is located four miles to the south. Currently, one rental car company offers services at the airport terminal. There is no public transit service to the airport, although a private company operates an on-demand shuttle bus from the surrounding area.

**TABLE 5** IPL Ground Access Projects

| IPL Ground Access Projects  |
|---|
| <b>Recently Completed Ground Access Projects</b>                          |
| None  |
| <b>Ground Access Projects Currently Under Construction (or in Design)</b> |
| None  |
| <b>Recent and On-going Ground Access Studies</b>                          |
| None  |
| <b>2016 RTP Ground Access Projects</b>                                    |
| 6120002: Reconstruct I-8 interchange at Imperial Avenue                   |
| <b>2015 FTIP Ground Access Projects</b>                                   |
| 0515: Reconstruct I-8 interchange at Imperial Avenue                      |

**TABLE 5** provides a detailed list of the ground access improvements at Imperial County Airport completed since the 2012 RTP/SCS, those currently in design or under construction, airport-related ground access improvements included in the 2016 RTP/SCS, and airport-related ground access improvements included in the 2015 FTIP.

## LOS ANGELES INTERNATIONAL AIRPORT (LAX)

Los Angeles International Airport (LAX) is located in southwestern Los Angeles County in the neighborhood of Westchester. Regional freeway access is provided by I-405 to the east and I-105 to the south. Vehicles arriving from the north and south utilize I-405 or Sepulveda Boulevard, and drivers arriving from the east use I-105 or Century Boulevard. World Way is the internal circulation roadway around the passenger terminals and has a lower level for arriving passengers and an upper level for departing passengers.

LAX is owned and operated by Los Angeles World Airports (LAWA), a proprietary department of the City of Los Angeles. LAWA operates LAX FlyAway, which provides non-stop bus service between each of the LAX terminals and seven locations: Van Nuys Airport, Union Station, Westwood, Hollywood, Santa Monica, Orange Line and Long Beach. In 2013, ridership on the two most used FlyAway routes, Van Nuys and Union Station, was 890,740 and 508,019 passengers, respectively. For longer distance bus travel from the airport, numerous private operators provide regularly scheduled bus service to LAX from the Antelope Valley, Bakersfield, the Central Coast, Santa Barbara and Ventura County. Two private shared-ride shuttle services are authorized to operate at LAX and serve the entire SCAG region.

LAX operates three shuttle routes on World Way. Route A circulates around the airport to provide passengers connections between terminals. Routes C and G have a stop within the central terminal area, with Route C connecting to the LAX-operated parking Lot C at the intersection of 96th Street and Sepulveda Boulevard, and Route G transporting passengers to and from the Metro Green Line Aviation Station. In addition to the LAX-operated Lot C, many other parking lots and structures are available in the surrounding neighborhood, and many hotels in the area and privately operated parking lots offer their customers courtesy shuttles to and from the passenger terminals.

Public bus services operated by Metro, Culver City Bus Lines, Santa Monica Big Blue Bus and Torrance Transit are available at the Metro Bus Center by connecting in Lot C using the LAX Shuttle Route C and to connect to their respective coverage areas. The Metro Green Line Aviation Station is the nearest urban rail line, nearly two miles to the southeast of the terminals and accessible using the LAX Shuttle Route G.

All rental car facilities are currently located off-site and are provided by about 40 companies.

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**TABLE 6** LAX Ground Access Projects

| LAX Ground Access Projects   |
|--|
| <b>Recently Completed Ground Access Projects</b>   |
| Widen Arbor Vitae Street (Airport Boulevard to La Cienega Boulevard)                                 |
| I-405 Sepulveda Pass Improvements Project  |
| Additional LAX FlyAway Service from Santa Monica, Hollywood, Orange Line and Long Beach              |
| <b>Ground Access Projects Currently Under Construction (or in Design)</b>                            |
| Crenshaw/LAX Transit Corridor Project and expansion of regional rail connectivity (Expo/Green Lines) |
| <b>Recent and On-going Ground Access Studies</b>   |
| I-105: Study report for interchange improvements at LAX Airport                                      |
| LAX Landside Access Modernization Program  |
| LAX Consolidated Rental Car Center (CONRAC) and long-term parking in Manchester Square               |
| Intermodal Transportation Facility (ITF) in the vicinity of Lot C                                    |
| Specific Plan Amendment Study  |
| LAX Airport Metro Connector  |
| Coastal Corridor Study   |
| Green Line Extension to LAX  |
| South Bay Metro Green Line Extension   |
| Century Corridor Streetscape Plan  |

| LAX Ground Access Projects  |
|---|
| <b>2016 RTP Ground Access Projects</b>  |
| 1TR1020: New airport bus division (capital costs only)                              |
| 1122003: Consolidated Rental Car Facility (ConRAC)                                  |
| 1122002: Intermodal Transportation Facilities (ITFs)                                |
| 1122001: Automated People Mover System (APM)  |
| 1TR0101: New Light Rail Station & Consolidated Bus facilities                       |
| LAOD198: Crenshaw/LAX Transit Corridor Project                                      |
| LAOD332: I-405 from La Tijera Boulevard to Jefferson Boulevard, add auxiliary lanes |
| <b>2015 FTIP Ground Access Projects</b>   |
| LAOD332: I-405 from La Tijera Boulevard to Jefferson Boulevard, add auxiliary lanes |
| LAE3764: ITS and intersection improvements in and near LAX Airport                  |
| LAOF073: Projects within and near LAX to eliminate traffic bottlenecks              |
| LAOG1161: Crenshaw/LAX accommodations near 96th Street/Aviation Boulevard           |
| LAOG1162: Airport Metro Connector   |
| LAOF073: Projects within and near LAX Airport to eliminate traffic bottlenecks      |

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Eleven of these companies are permitted to operate courtesy shuttles between the terminals and their facilities. Taxicabs are available curbside at each terminal outside the baggage claim area at the yellow taxi signs. In December, 2015 LAX began to allow Transportation Networking Companies (TNC's) such as Uber and Lyft to pick up and drop off passengers at designated points at the airport.

In December 2014, LAWA's Board of Airport Commissioners approved a plan to overhaul and modernize LAX's ground access and transportation connections for arriving and departing passengers. The approved program includes the LAX Train (Automated People Mover System), Intermodal Transportation Facilities (ITF), Consolidated Rent-A-Car Center (CONRAC), central terminal area improvements, and connection with the Metro Crenshaw Line, which is under construction. The CONRAC will consolidate the numerous off-site rental car facilities in the surrounding area into one convenient location 1.5-miles east of LAX and adjacent to I-405 for convenient regional highway access. Two ITFs are included in the program offering airport travelers locations for parking, passenger pick-up and drop off, and flight check-in outside the terminal and away from the congested World Way roadway within LAX. The eastern ITF will include Metro facilities to connect with Metro's planned 96th Street/Aviation Boulevard Station serving the under-construction Metro Crenshaw/LAX Transit Project and existing Metro Green Line as well as a bus plaza for Metro and municipal buses. The LAX Train will be an elevated automated people mover system with six stations connecting the CONRAC, both ITFs, and Metro facilities to the LAX passenger terminals by connecting into an upgraded central terminal area. The environmental review process for this project began in 2015 and construction is expected to begin in 2017.

**TABLE 6** provides a detailed list of the ground access improvements at LAX completed since the 2012 RTP/SCS, those currently in design or under construction, airport-related ground access improvements included in the 2016 RTP/SCS, and airport-related ground access improvements included in the 2015 FTIP.

### LONG BEACH AIRPORT (LGB)

Long Beach Airport (LGB) is located on Lakewood Boulevard north of I-405 in the City of Long Beach. The airport has one terminal building with two concourses (north and south) and eleven total gates. In December 2012, construction was completed on renovations to the terminal to expand and modernize its amenities and plan for an expected increased passenger demand.

Regional automobile traffic arrives via I-405 and Lakewood Boulevard. Donald Douglas Drive is an internal airport roadway that circles the Airport Ground Transportation Center and provides access to the terminals. The Airport Ground Transportation Center includes

**TABLE 7** LGB Ground Access Projects

| LGB Ground Access Projects  |
|---|
| <b>Recently Completed Ground Access Projects</b>                                    |
| Long Beach Airport Access: Spring Street and Lakewood Boulevard tunnel improvements |
| Long Beach Airport Terminal Area Improvement Project                                |
| <b>Ground Access Projects Currently Under Construction (or in Design)</b>           |
| None  |
| <b>Recent and On-going Ground Access Studies</b>                                    |
| None  |
| <b>2016 RTP Ground Access Projects</b>  |
| None  |
| <b>2015 FTIP Ground Access Projects</b>   |
| None  |

a recently completed five-story parking garage with over 5,000 spaces and also houses six rental car companies. A taxi stand is located on Donald Douglas Drive just outside the terminal. In addition, 28 shuttle providers are currently authorized to pick passengers up on airport property.

Transit access is provided by bus on Long Beach Transit Authority's Routes 102, 104, 111 and 176 utilizing the Airport Ground Transportation Center.

**TABLE 7** provides a detailed list of the ground access improvements at Long Beach Airport completed since the 2012 RTP/SCS, those currently in design or under construction, airport-related ground access improvements included in the 2016 RTP/SCS, and airport-related ground access improvements included in the 2015 FTIP.

## ONTARIO INTERNATIONAL AIRPORT (ONT)

Ontario International Airport is located just south of I-10 in the City of Ontario, about 35 miles east of downtown Los Angeles. Two passenger terminal buildings are located along the northern side of the airport along Terminal Way. Los Angeles World Airports (LAWA) owns and operates the airport today. LAWA has agreed to terms and conditions for the transfer of the airport in the coming months to a new airport sponsor, the Ontario International Airport Authority (OIAA), pending review and approval by the Federal Aviation Administration (FAA).

The airport is located between two major east-west highway corridors within the SCAG region, I-10 and SR 60. Regional access is generally provided by these freeways, with regional north-south access provided by I-15 about two miles to the east. The Archibald Avenue interchange on I-10 is the primary access point to Terminal Way, which circles a large surface parking lot and provides drop-off/pick-up access to the passenger terminals. Additional private airport parking is provided on Airport Drive, just east of the airport.

A Consolidated Rental Car Facility (ConRAC) is located in the northeast corner of the airport, near the intersection of Airport Drive and Haven Avenue, and serves eight on-airport rental car companies. Three additional off-airport rental car companies also serve the airport. A courtesy shuttle operated by the airport provides service between the passenger terminals, the long-term parking lot, and the ConRAC. Taxicab service can be picked up curbside outside the baggage claim area. A private shared-ride shuttle operator offers door-to-door shared-ride services from the terminals on both an advanced reservation and walk up basis.

Two bus routes operated by OmniTrans have stops that serve the airport. Routes 81 and 82 have stops at the intersection of Airport Drive and Haven Avenue, where passengers can transfer to the airport courtesy shuttle to be transported to the terminals.

No direct rail service currently operates to the airport. The East Ontario Metrolink Station, which serves the Metrolink Riverside Line, is located about two miles southeast of the airport terminals, but no direct transit connection is currently provided to the terminals. The California High Speed Rail Authority is also planning to have a station at Ontario International Airport.

The 2014 SANBAG Ontario Airport Rail Access Study examined six alternatives to connect Ontario Airport to the regional rail system. One of these alternatives is the Metro Gold Line Foothill Extension Phase 2C that would extend the eastern terminus of the Metro Gold Line to the airport. Phase 2B to Montclair is included in the Financially Constrained Project list in this RTP/SCS, but Phase 2C is currently not funded. A direct shuttle bus connection from the Rancho Cucamonga Metrolink Station is included in the project list for 2020, and a rail connection from Metrolink to the airport is included for 2040.

TABLE 8 ONT Ground Access Projects

| ONT Ground Access Projects  |
|---|
| <b>Recently Completed Ground Access Projects</b>  |
| None  |
| <b>Ground Access Projects Currently Under Construction (or in Design)</b>                         |
| North Vineyard Avenue Railroad Grade Separation at Holt Boulevard                                 |
| Construct a Grade Separation at Milliken/Union Pacific LA Line                                    |
| <b>Recent and On-going Ground Access Studies</b>  |
| SANBAG Ontario Airport Rail Access Study  |
| Gold Line LRT Foothill Extension  |
| <b>2016 RTP Ground Access Projects</b>  |
| 4160023: Widen Archibald Avenue from Inland Empire Boulevard for 4 to 6 lanes                     |
| 4160035: Widen Guasti Road from Holt Boulevard to Archibald Avenue from 2 to 4 lanes              |
| 4160063: Widen State Street from Bon View Avenue to Grove Avenue from 2 to 4 lanes                |
| 4120145: Spot widen Airport Drive from Rochester Avenue to Etiwanda Avenue from 2 to 4 lanes      |
| 200804: South Archibald Avenue grade separation (at Mission Boulevard).                           |
| 4G0104/4G0112: Widen grade separation @ UPRR Alhambra/Los Angeles Lines from 2 to 4 lanes         |
| 4A07325: Construct bridge on Holt Boulevard over West Cucamonga Creek and widen from 4 to 6 lanes |
| 4A01203: Widen Francis Street from Benson Avenue to Campus Avenue from 2 to 4 lanes               |
| 4A01210: Widen Holt Boulevard from Benson Avenue to Vineyard Avenue from 2 to 4 lanes             |
| 4A07327: Construct bridge on Holt Boulevard over Cucamonga Creek-and widen from 4 to 6 lanes      |
| 4A01213: Widen Jurupa Street from Turner Avenue to Hofer Ranch Road from 2 to 6 lanes             |



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TABLE 8 ONT Ground Access Projects: Continued

| ONT Ground Access Projects   |
|--|
| 4A07233: Widen Mission Boulevard from Benson to Milliken Avenue from 4 to 6 lanes  |
| 4A07317: Construct bridge on Mission Boulevard over Cucamonga Creek and widen from 4 to 6 lanes  |
| 4A07215: Construct bridge on Mission Boulevard over West Cucamonga Creek and widen from 4 to 6 lanes   |
| 4A07266: Widen Philadelphia Street from Campus Avenue to 750' e/o Grove Avenue from 2 to 4 lanes   |
| 4A07138: Widen Philadelphia Street from Vineyard Avenue to Cucamonga Creek from 2 to 4 lanes, including bridge over Cucamonga Creek                                      |
| 4A07267: Construct bridge on Riverside Drive over Cucamonga Creek and widen from 4 to 6 lanes  |
| 4A01222: Widen Vineyard Avenue from 4th Street to I-10 from 4 to 6 lanes   |
| 2002160-2002160: I-10 at Grove Avenue interchange and Grove Avenue corridor  |
| 4160002: Widen Interchange for I-10 @ Vineyard Avenue from 4 to 6 lanes, widen on/off ramps from 2 to 4 lanes  |
| 200803: I-10 at Vineyard Avenue interchange: widening from 4-6 lanes and widen on and off ramps to two lanes, intersection improvements and enhance existing landscaping |
| 200602-200602: SR 60 and Vineyard Avenue interchange reconstruction-lengthen bridge to accommodate Vineyard Avenue widening and ramp widening 4-6 lanes                  |
| 200604: SR 60 at Grove Avenue interchange reconstruction and Grove Avenue +/-300 ft. n/s of SR 60-widen from 4-6 lanes   |
| 4M07017: SR 60 at Archibald Avenue widen on and off ramps (2-3 lanes each way)   |
| 416009: Interchange reconstruction for SR 60 at Grove Avenue   |
| 4160010: Interchange reconstruction for SR 60 at Vineyard Avenue   |
| 4122002: Double tracking of Metrolink San Bernardino Line between CP Central and CP Archibald in San Bernardino County   |
| 4160048: Direct Shuttle bus connection from Rancho Cucamonga Metrolink Station to Ontario Airport  |
| 4160049: Passenger Rail Service from San Bernardino to Metrolink Line to Ontario Airport   |
| 4120004-20159902: I-10 corridor express lane widening (phase 1)  |

| ONT Ground Access Projects  |
|---|
| 4120005-20159903: I-10 corridor express lane widening (phase 2)   |
| <b>2015 FTIP Ground Access Projects</b>   |
| 2002160: I-10 at Grove Avenue and 4th Street: relocate interchange from 4th Street to Grove Avenue. Widen the existing 4th Street undercrossing (2-4 lanes) to match rest of 4th Street. Concurrent project with Grove Avenue widening (20150201) |
| 20150201: Grove Avenue Corridor: Widen Grove Avenue from I-10 to Airport Drive (4-6 lanes). Concurrent with I-10/Grove Avenue Interchange Project (2002160)   |
| 200803: I-10 at Vineyard Avenue interchange. Widen interchange from 4-6 lanes and widen on and off ramps to two lanes, intersection improvements and enhance existing landscaping.  |
| 200602: SR 60 and Vineyard Avenue interchange reconstruction-lengthen bridge to accommodate Vineyard Avenue widening and ramp widening 4-6 lanes  |
| 200604: SR60 at Grove Avenue interchange reconstruction and Grove Avenue +/-300 ft. n/s of SR 60-widen from 4-6 lanes   |
| 201132: SR-60 at Archibald Avenue widen on and off ramps (2-3 lanes each way); add additional left turn pockets from Archibald to SR-60 on ramps (non-capacity enhancing along Archibald)   |
| 200602: SR 60 and Vineyard Avenue interchange reconstruction-lengthen bridge to accommodate Vineyard Avenue widening and ramp widening 4-6 lanes  |
| 200805: North Vineyard Avenue grade separation - between Holt Boulevard and Airport Drive building railroad bridge flyover-no lanes added to arterials. The grade separation is at the UPRR Alhambra Line   |
| 200405: South Milliken Avenue grade separation - on Milliken from UPR to north of Mission Boulevard railroad grade separation-construct o/c/u/c at RR-realignment of STS to meet overcrossing & intersection improvements                         |

**TABLE 8** provides a detailed list of the ground access improvements at LA/Ontario International Airport completed since the 2012 RTP/SCS, those currently in design or under construction, airport-related ground access improvements included in the 2016 RTP/SCS, and airport-related ground access improvements included in the 2015 FTIP.

## PALMDALE REGIONAL AIRPORT (PMD)

Palmdale Regional Airport is in the City of Palmdale, about 60 miles north of downtown Los Angeles. Since 2013, it has been managed by the Palmdale Airport Authority. The Airport Authority has the ability to use both Department of Defense owned runways. The passenger terminal is located at the southwest corner of the airport, on Avenue P.

Regional access to the airport is provided by SR 14, about three miles west of the airport. As Palmdale Airport currently has no scheduled commercial air service, there are no rental car facilities at the airport, and no private operators provide ground transportation services to the airport.

The Palmdale Transportation Center, including the Palmdale Metrolink Station on the Metrolink Antelope Valley Line, is located about two miles southwest of the airport. The Transportation Center currently provides connections with the local public transit provider, Antelope Valley Transit Authority (AVTA). No AVTA routes currently serve the airport. The Palmdale Transportation Center is the proposed site of a future California High-Speed Rail station.

**TABLE 9** provides a detailed list of the ground access improvements Palmdale Regional Airport completed since the 2012 RTP/SCS, those currently in design or under construction, airport-related ground access improvements included in the 2016 RTP/SCS, and airport-related ground access improvements included in the 2015 FTIP.

## OXNARD AIRPORT (OXR)

Oxnard Airport is located in the northwest part of the City of Oxnard in Ventura County. Regional highway access is from SR 1 to the north and south, or US 101 to the north and east. Ground access to the passenger terminal is provided by Fifth Street. No scheduled passenger service has been offered at the airport since 2010.

Four rental car companies operate from the airport terminal. Additionally, the Ventura County Airporter Shuttle operates eight daily roundtrips between OXR and LAX.

Gold Coast Transit is the municipal transit provider, and bus Route 19 has a stop on Fifth Street near the terminal. The Oxnard Transportation Center is located about two miles east

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**TABLE 9** PMD Ground Access Projects

| PMD Ground Access Projects   |
|--|
| Recently Completed Ground Access Projects  |
| None   |
| Ground Access Projects Currently Under Construction (or in Design)   |
| Rancho Vista Boulevard grade separation  |
| Recent and On-going Ground Access Studies  |
| Transit Oriented Development Project near Palmdale Transit Center  |
| Avenue Q Feasibility Study   |
| High Desert Corridor/P-8 Freeway   |
| 2016 RTP Ground Access Projects  |
| LA962212: Route 138: In Palmdale @ Avenue P-8 from Route 14 to 100th Street - Acquisition of ROW for future Route 138  |
| 1TDL04: Expansion and Improvement to existing Transit Center in the City of Palmdale   |
| 2015 FTIP Ground Access Projects   |
| LAF3403: Palmdale Transportation Center - Platform Extension   |
| LA06897: SR 138/14: Widening from Rancho Vista Boulevard (RVB) to Palmdale Boulevard   |
| LAF1104: Rancho Vista Boulevard (RVB) Grade Separation at Sierra Highway/UPRR/Metrolink RR Crossing  |
| LAF1104B: Phase 2-Construct a railroad grade separation of Rancho Vista Boulevard at both Sierra Highway and the double-track at-grade crossing of the Southern California Regional Rail Authority (SCRRA) Metro-link and Union Pacific Railroad (UPRR) tracks |

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of the airport and provides connections to additional Gold Coast Transit routes, as well as rail connections to Amtrak’s Coast Starlight and Pacific Surfliner Routes, as well as Metrolink’s Ventura County Line.

There are no recently planned or completed ground access projects at Oxnard Airport.

## MARCH AIR RESERVE BASE (RIV)

March Air Reserve Base (RIV) is operated as a public-use airport under a Joint Use Agreement with the Air Force. It is located in unincorporated Riverside County between the cities of Riverside and Moreno Valley. A passenger terminal opened in 2013 to accommodate general aviation activities. Parking lots are located adjacent to the operations control tower and the passenger terminal. Currently, no on-site facilities for rental cars, taxicabs or shuttle services exist.

Regional access is provided by I-215, which runs in a north-south alignment directly west of the airport, and SR 60, which runs in an east-west alignment north of the airport. Ground access to airport facilities is provided by Cactus Avenue. Recent and planned improvements to Heacock Street and Harley Knox Boulevard will facilitate ground access to the airport, particularly for trucks.

The Moreno Valley/March Field Station on the Perris Valley Line extension of the Metrolink 91 Line is located near the entrance to the airport. Rail service is anticipated to begin in late 2015.

**TABLE 10** provides a detailed list of the ground access improvements March Air Reserve

**TABLE 10 RIV Ground Access Projects**

| RIV Ground Access Projects  |
|---|
| <b>Recent and On-going Ground Access Studies</b>  |
| None  |
| <b>2016 RTP Ground Access Projects</b>  |
| 3A01WT049A: In the City of Moreno Valley - Widen Alessandro Boulevard between I-215 and Frederick Street from 4 to 6 lanes. |
| RIV071240-RIV071240: In the City of Moreno Valley - east bound Cactus Avenue widening between Veterans Way & Heacock Street |

**TABLE 10 RIV Ground Access Projects: Continued**

|   |
|---|
| I-215 North Project (Phase 3 of 3): Add HOV lane in each direction and WB auxiliary lane                          |
| 3A04WT054: In the City of Moreno Valley - widen Heacock Street between Cactus Avenue and San Michele Road         |
| 3160037: Widen Heacock Street between Heacock Bridge Lateral A and Cactus Avenue                                  |
| 3A0801: In the City of Moreno Valley - Widen Heacock Street between San Michele Road and Harley Knox Boulevard    |
| 3A04WT068: Widen San Michele Road between Heacock Street and Indian Avenue  |
| 3M04WT017: Widen/reconstruct Heacock interchange, ramps, and channelization improvements.                         |
| RIV050533-RIV050533: At I-215/Cactus Avenue interchange   |
| <b>2015 FTIP Ground Access Projects</b>   |
| RIV080905: In the City Of Moreno Valley - Widen Alessandro Boulevard between I-215 and Frederick Steet            |
| RIV071240: In the City Of Moreno Valley – E/B Cactus Avenue Widening between Veterans Way & Heacock Street        |
| RIV080910: In the City of Moreno Valley - Widen Heacock Street between Cactus Avenue and San Michele Road         |
| RIV080911: In the City Of Moreno Valley - Widen Heacock Street between San Michele Road and Harley Knox Boulevard |
| RIV050533: At I-215/Cactus Avenue Interchange: widen interchange  |
| <b>Recently Completed Ground Access Projects</b>  |
| I-215/Van Buren Boulevard Interchange Improvements  |
| <b>Ground Access Projects Currently Under Construction (or in Design)</b>   |
| Perris Valley Metrolink extension, including a March Field Station  |
| Harley Knox Boulevard Improvements  |

Base completed since the 2012 RTP/SCS, those currently in design or under construction, airport-related ground access improvements included in the 2016 RTP/SCS, and airport-related ground access improvements included in the 2015 FTIP.

## PALM SPRINGS INTERNATIONAL AIRPORT (PSP)

Palm Springs International Airport is located in the Coachella Valley, in the City of Palm Springs. The passenger terminal is located at the end of Tahquitz Canyon Way in the southwest portion of the airport and consists of two concourses with a total of 17 gates.

Regional access is provided by I-10, about four miles north of the airport. Kirk Douglas Road is the internal airport roadway that circles the on-site surface parking lots and provides access to the terminals. Taxicabs, private transportation companies, and public shared-shuttle companies, and can be picked up on the north side of the terminal adjacent to rental car facilities.

Transit access is provided by municipal bus provider Sunline’s SunBus Route 24, which stops just outside the airport at the Kirk Douglas Way/El Cielo Road/Tahquitz Canyon Way intersection. Regional bus connections include the Morongo Basin Transit Authority’s Routes 12 and 15.

**TABLE 11** PSP Ground Access Projects

| PSP Ground Access Projects   |
|--|
| <b>Recently Completed Ground Access Projects</b>   |
| Upgrade I-10/Gene Autry Trail interchange ramps to a 2-lane configuration. Modify Gene Autry Trail from 2 to 6 lanes (from I-10 interchange to Salvia Rd.) |
| Upgrade I-10/Date Palm interchange ramps to a 2-lane configuration   |
| Widen Indian Canyon Drive to a 6-lane configuration (from Union Pacific Rail Road to I-10)   |
| <b>Ground Access Projects Currently Under Construction (or in Design)</b>  |
| None   |
| <b>Recent and On-going Ground Access Studies</b>   |
| None   |

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**TABLE 11** PSP Ground Access Projects: Continued

| PSP Ground Access Projects  |
|---|
| <b>2016 RTP Ground Access Projects</b>  |
| 3A07100-RIV110124: In the Coachella Valley in the City of Palm Springs - Ramon Road widening between San Luis Rey Drive & Landau Boulevard  |
| 3A07004: Gene Autry Trail, new bridge to replace existing low water crossing at Whitewater River.   |
| 3A07018A: Landau Boulevard, construct new 6-lane road between Vista Chino and I-10, including overcrossing at Whitewater River  |
| 3A01CV078: Widen Ramon Road from 4 to 6 lanes between Gene Autry Rail and White water River   |
| 3A07005: Widen Ramon Road from 4 to 6 lanes between S. Indian Canyon to Sunrise Way, including Baristo Storm Channel crossing)  |
| 3A07145: Widen Ramon Road from 4 to 6 lanes between S. Palm Canyon Dr to S. Indian Canyon Drive   |
| RIV031205: In the City of Palm Springs - widen Ramon Road from 4 to 6 lanes   |
| 3M0722: On I-10, Construct new 6-lane mixed flow, partial cloverleaf IC with auxiliary lanes and 4 two lane ramps plus 6 lane grade separation bridge over UPRR between Palm Drive ICDr Interchange and Date Palm Drive Interchange |
| 3TR04C: Implement Bus Rapid Service/BRT on Highway 111  |
| 3TC04TR3: Construct 3 transit centers (west, central, and east valley) in Coachella Valley  |
| <b>2015 FTIP Ground Access Projects</b>   |
| RIV110124: In the Coachella Valley in the City of Palm Springs - Ramon Road Widening between San Luis Rey Drive & Landau Boulevard  |
| RIV031205: In the City of Palm Springs - widen Ramon Road from 4 to 6 lanes   |
| RIV041021: Bus rapid transit (BRT) enhancements   |

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**TABLE 11** provides a detailed list of the ground access improvements Palm Springs International Airport completed since the 2012 RTP/SCS, those currently in design or under construction, airport-related ground access improvements included in the 2016 RTP/SCS, and airport-related ground access improvements included in the 2015 FTIP.

## SAN BERNARDINO INTERNATIONAL AIRPORT (SBD)

San Bernardino International Airport (SBD) is located in the City of San Bernardino. The airport has domestic and international passenger terminals on the northwestern portion of the property but does not currently have scheduled passenger service. The international terminal has Federal Inspection Service (FIS) facilities. I-10 provides regional access from the east and west, and I-215 provides regional access from the north and south. SR 210 provides additional access from the northwest. Recent and ongoing improvements to I-215 through downtown San Bernardino and to the Tippecanoe Avenue interchange on I-10 have improved ground access to the airport. Local access to the airport facilities is provided by Tippecanoe Avenue and Third Street.

OmniTrans is the municipal public transit provider in San Bernardino County. Its Route 8 has a stop on Harry Shepard Boulevard at Del Rosa Drive, a quarter-mile from the terminal building entrances. There are no rental car facilities at the airport, and no private operators provide ground transportation services to the airport.

**TABLE 12** SBD Ground Access Projects

| SBD Ground Access Projects  |
|---|
| <b>Recently Completed Ground Access Projects</b>                                  |
| Construct a truck traffic access road to SBD Air Cargo Terminal at Perimeter Road |
| Construct a 4-lane bridge on Mountain View Avenue over the Santa Ana River        |
| <b>Ground Access Projects Currently Under Construction (or in Design)</b>         |
| Upgrade 5th St to a 4-lane major arterial and improve capacity at intersections   |
| Tippecanoe Ave/Anderson Street Interchange with I-10 (Phase 2)                    |

**TABLE 12** SBD Ground Access Projects: Continued

| SBD Ground Access Projects  |
|---|
| <b>Recent and On-going Ground Access Studies</b>  |
| Redlands Passenger Rail Project will have a station on Tippecanoe Avenue                              |
| Improve 3rd St near SBD   |
| <b>2016 RTP Ground Access Projects</b>  |
| 200213: Widen 3rd St. from Palm Ave. to 5th St.   |
| 200852: Del Rosa Drive From 5th Street to 6th Street-Widen from 2 to 4 Lanes                          |
| 4A07142: Tippecanoe Avenue From 3rd Street To 5th Street - Widen from 2-4 Lanes                       |
| SBD55031: Alabama Street From 3rd Street To South City Limits   |
| 4M01003-2011154: SR 210 At 5th St/Greenspot Rd; On and Off Ramps Widening; Add Lanes                  |
| 200419: Alabama St widening - widen from 2-4 lanes from north city limits to 3,000 ft. north Palmetto |
| 4A01237: Widen Alabama St from 2 to 4 lanes   |
| 4A07017: Widen Alabama St from Lugonia Ave to Barton Rd from 4 to 6 lanes                             |
| 4A07042: Widen Alabama St from North Redlands City Limits to Palmetto Ave from 2 to 4 lanes           |
| 4A07184: Widen California St from Redlands Blvd to Palmetto Ave from 5 to 6 lanes                     |
| 4A07255: Widen Lugonia Ave from California St to Tennessee St from 2 to 4 lanes                       |
| 4A01246: Widen Lugonia Ave from Tennessee St to Orange St from 2 to 4 lanes                           |
| 4A07154: Widen Palmetto Ave from California St to Alabama St from 2 to 4 lanes                        |

**TABLE 12 SBD Ground Access Projects: Continued**

| SBD Ground Access Projects  |
|---|
| 4A01281: Widen San Bernardino Ave from Alabama St to California St from 2 to 4 lanes              |
| 200609: Mt. View Widening/Extension Project- Widen S/B From 2-4 lanes- from Coulston to Riverview |
| 4A07119: 5th Street from Sterling Ave to Victoria Ave Widen from 2-4 lanes                        |
| 4OM0701-201184: Sterling Ave from 3rd Street to 5th Street - Widen from 2-4 lanes                 |
| SBD41317: Mountain View Ave bridge at Mission Creek Channel - Widen roadway                       |
| 4A07230: Widen 5th St from Pedley Rd to Tippecanoe Ave from 2 to 4 lanes                          |
| 4A07292: Widen 5th St from Warm Creek (0.3 mi. east of Waterman) to Pedley Ave from 2 to 4 lanes  |
| 4A07081: Widen Coulston Ave Av from Tippecanoe Ave to Mountain View Ave from 2 to 4 lanes         |
| 4A07380: Widen Del Rosa Ave from Del Rosa Dr to San Bernardino City Limits from 2 to 4 lanes      |
| 4A07135: Widen Rialto Ave Av from Lena Rd to Tippecanoe Ave Av from 2 to 4 lanes                  |
| 4A07178: Widen Rialto Ave from Sierra Way to Waterman Ave from 2 to 4 lanes                       |
| 4A07152: Widen Tippecanoe Ave from Mill St to Harriman from 4 to 6 lanes                          |
| 44810: I-10 Tippecanoe reconfigure Interchange and local road Improvements/Modifications          |
| 2015 FTIP Ground Access Projects  |
| 200213: On 3rd St. from Palm Ave. to 5th St. - Widen 3rd St. e/o Palm Ave. from 2 to 3 lanes      |
| 201180: Del Rosa Drive from 5th Street to 6th Street-Widen from 2 to 4 lanes                      |
| 201182: Tippecanoe Avenue from 3rd Street to 5th Street - Widen from 2-4 lanes                    |
| SBD55031: Alabama Street From 3rd Street To South City Limits - Widen From 2 To 3 S/B Lanes       |
| 2011154: SR 210 at 5th St/Greenspot Rd; On and off ramps widening; Add Lanes                      |
| 201183: 5TH ST FROM TIPPECANOE AVE TO DEL ROSA DR – WIDEN FROM 2-4 LANES                          |

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**TABLE 12** provides a detailed list of the ground access improvements San Bernardino International Airport completed since the 2012 RTP/SCS, those currently in design or under construction, airport-related ground access improvements included in the 2016 RTP/SCS, and airport-related ground access improvements included in the 2015 FTIP.

### JOHN WAYNE ORANGE COUNTY AIRPORT (SNA)

John Wayne Orange County Airport is located in unincorporated Orange County, near the cities of Santa Ana, Irvine, Newport Beach and Costa Mesa. Three terminal buildings are located just off MacArthur Boulevard in the northeast corner of the airport along Airport Way.

John Wayne Airport sits in between multiple major highways, including I-405 to the north, SR 55 to the west and SR 73 to the south, that provide regional access to the airport. MacArthur Boulevard in Irvine connects directly to the airport facilities. Airport Way operates as the circulating roadway between the three terminals and other airport passenger facilities. Several parking garages are available in the main terminal area. An additional off-site parking lot is located on Main Street in Irvine, with a free shuttle to the terminal.

Most of the ground transportation facilities are located in the Ground Transportation Center (GTC), on the lower concourse level on Airport Way in the middle of the terminal buildings. The GTC contains transfers to buses, shuttles, taxicabs and eight on-site rental car providers. An additional fifteen off-site rental car companies are authorized to pick up passengers from the terminal and shuttle them to each company's personal facilities. As a major destination in the area, the Disneyland Resort operates an express shuttle for passengers that can be picked up at the GTC.

The local public transit service providers are the Orange County Transportation Authority (OCTA) and City of Irvine's Irvine Shuttle (iShuttle). OCTA bus Routes 76 and 212 directly serve the airport with a stop at the GTC on the lower level. The iShuttle's Route A operates between the GTC and the Tustin Metrolink Station about five miles to the northeast. The Tustin Metrolink Station provides connections with trains on both the Orange County and Inland Empire Metrolink lines, as well as other OCTA bus routes and iShuttle Route B.

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**TABLE 13 SNA Ground Access Projects**

| SNA Ground Access Projects  |  |
|---|--|
| <b>Recently Completed Ground Access Projects</b>  |  |
| Add 1 northbound ramp and westbound right-turn lane on Paularino at SR-55   |  |
| <b>Ground Access Projects Currently Under Construction (or in Design)</b>   |  |
| None  |  |
| <b>2016 RTP Ground Access Projects</b>  |  |
| ORA016: Paularino Avenue (SR-55 northbound frontage road at Paularino Avenue) in Costa Mesa                                       |  |
| 2M0733: On SR-55, add 1 mixed flow lane each direction and fix chokepoints from I-405 to I-5                                      |  |
| 2H0706: On SR-73, add HOV connector between I-405 and SR-73   |  |
| 2H0707: On SR-73, add 1 HOV lane each direction from MacArthur to I-405   |  |
| ORA030605-ORA030605: I-405 from SR-73 to I-605. Add 1 mixed flow lane in each direction   |  |
| ORA030605-ORA030605A: I-405 from SR-73 to I-605. Convert existing HOV to HOT.   |  |
| 2M0728: Add 1 MF lane each direction from I-5 to SR-55 and add southbound auxiliary lanes from 133 to Irvine Center Drive         |  |
| <b>2015 FTIP Ground Access Projects</b>   |  |
| ORA015: Baker Street and SR-55; northbound & southbound frontage road improvements  |  |
| ORA016: Paularino Avenue (SR-55 northbound frontage road at Paularino Avenue) Costa Mesa intersection improvement                 |  |
| ORA017: Paularino Avenue (SR-55 southbound frontage road in Costa Mesa), Intersection improvement add southbound right-turn lane. |  |
| ORA100511: SR-55 widening between I-405 and I-5 - add 1 mixed flow lane each direction and fix chokepoints from I-405 to I-5      |  |
| ORA030605: I-405 from SR-73 to I-605. Add 1 MF lane in each direction   |  |
| ORA030605A: I-405 from SR-73 to I-605. Convert existing HOV to HOT  |  |
| ORA131304: I-405(I-5 to SR-55)-Add 1 MF lane each direction from I-5 to SR-55 and improve merging                                 |  |

**TABLE 13** provides a detailed list of the ground access improvements John Wayne Orange County Airport completed since the 2012 RTP/SCS, those currently in design or under construction, airport-related ground access improvements included in the 2016 RTP/SCS, and airport-related ground access improvements included in the 2015 FTIP.

## SOUTHERN CALIFORNIA LOGISTICS AIRPORT (VCV)

Southern California Logistics Airport is located in the City of Victorville in San Bernardino County, about 20 miles north of the city of San Bernardino. Regional access to the airport is provided by US 395 and I-15. Direct access to airport facilities is available from Phantom Way at Worley Boulevard/George Boulevard.

As the airport currently has no scheduled passenger air service, there are no rental car facilities at the airport, and no private operators provide ground transportation services to the airport. Victor Valley Transit bus Route 32 has a stop just outside the airport at the Phantom Way/George Boulevard intersection.

The proposed High Desert Corridor project is currently in the environmental review stage. When constructed, it will provide a new multipurpose east-west corridor between SR 14 and SR 18 and greatly improve ground connections from the airport to the regional highway system.

There are no recently planned or completed ground access projects at Southern California Logistics Airport.

## TECHNICAL AND POLICY COMMITTEE REVIEW

The development of the regional and airport forecasts was reviewed by technical and policy committees throughout the preparation of the 2016 RTP/SCS. In addition, airport operators were consulted regarding the operations of their airports. **TABLE 14** lists the dates of committee meetings and the actions taken at each.

**TABLE 14** Lists the dates of committee meetings and the actions taken at each

| Date    | Committee                             | Agenda/Action  |
|---------|---------------------------------------|--|
| 8/28/14 | Aviation Technical Advisory Committee | Data request to airport operators  |
| 3/13/15 | Aviation Technical Advisory Committee | Review of airport capacity constraints methodology and results               |
| 4/23/15 | Aviation Technical Advisory Committee | Review of overall regional passenger demand forecast methodology and results |
| 6/4/15  | Transportation Committee              | Approval of overall regional passenger demand forecast                       |
| 6/25/15 | Aviation Technical Advisory Committee | Review of ground access modeling methodology                                 |
| 7/2/15  | Transportation Committee              | Initial airport forecasts agendized but not presented                        |
| 7/23/15 | Transportation Committee              | Presentation of initial airport forecasts; no action taken                   |
| 8/6/15  | Transportation Committee              | Approval of individual airport demand forecasts                              |
| 10/8/15 | Transportation Committee              | Approval of cargo forecasts and of ground access strategies                  |



**NOTES**

<sup>1</sup> Southern California Association of Governments. August 2015. Regional Aviation Forecast: Analysis of Airport Capacity Constraints Technical Memorandum. Prepared by: AECOM.







## SOUTHERN CALIFORNIA ASSOCIATION of GOVERNMENTS

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## APPENDIX

TRANSPORTATION SYSTEM | AVIATION AND AIRPORT  
GROUND ACCESS

ADOPTED | APRIL 2016

[WWW.SCAGRTPSCS.NET](http://WWW.SCAGRTPSCS.NET)

# **EXHIBIT**

# **13**

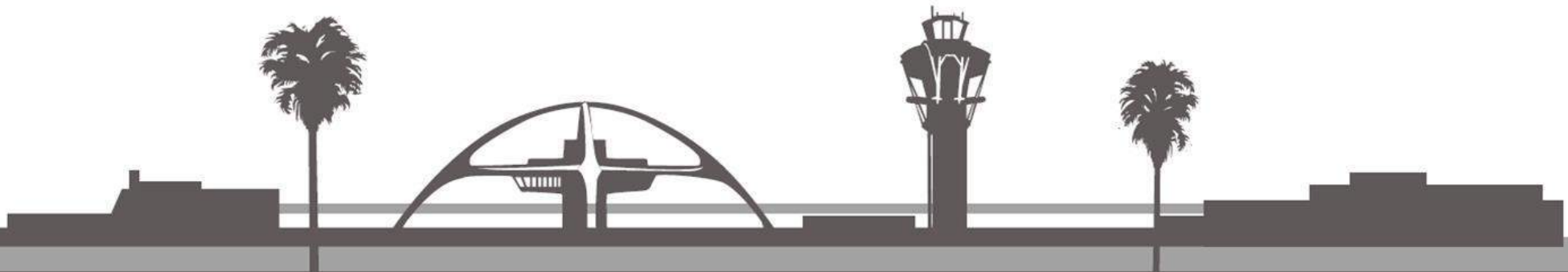
Los Angeles International Airport

**ATMP-AL010**

## LAX – Runway 7L-25R Shift Study

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El Segundo Briefing  
January 29<sup>th</sup>, 2015



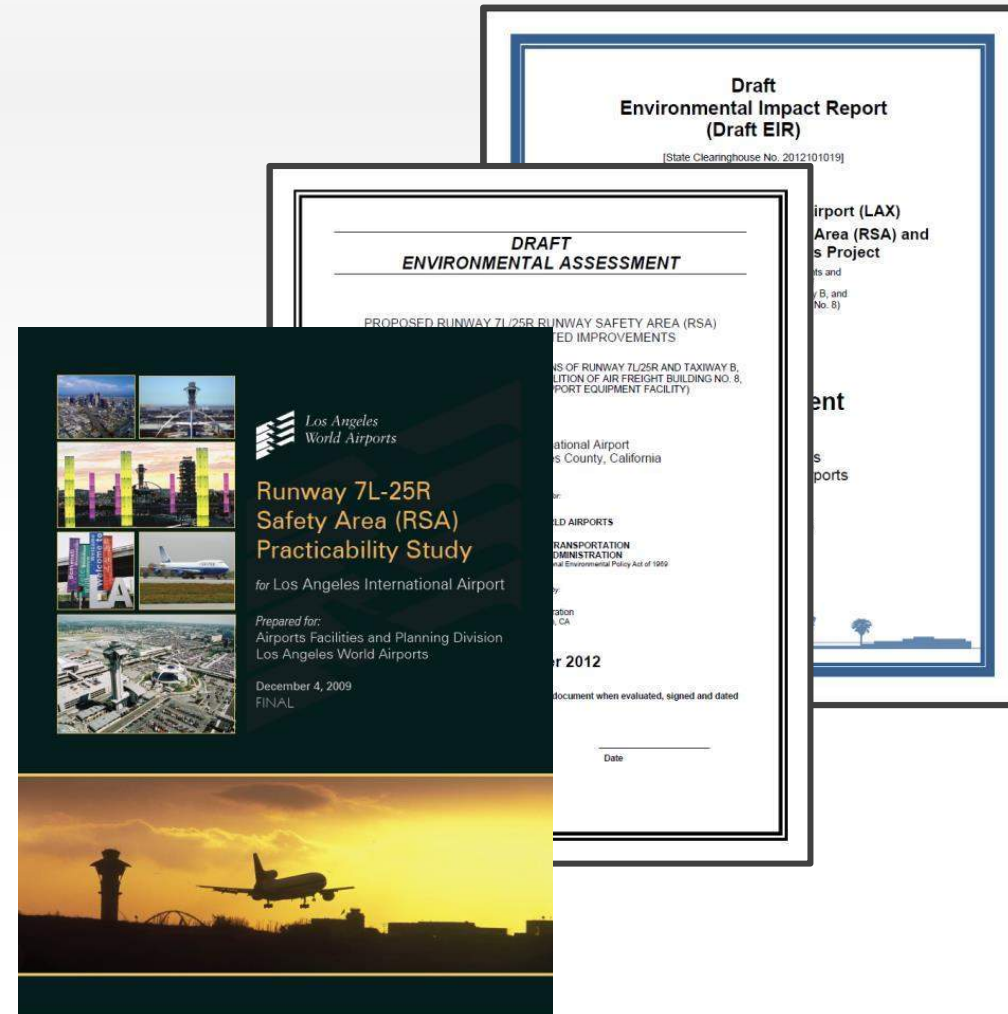
## 2 Meeting Agenda

- Project Background
- Shift Study Analysis
  - LAX Operational Impacts
  - Obstructions Analysis
  - VOR Discussion
- Discussion

### 3 Project Background

- Origin of “shift” concept is the 2009 RSA Practicability Study
- Carried into 2012 NEPA and 2013 CEQA analyses
- Operational impacts evaluated in this study

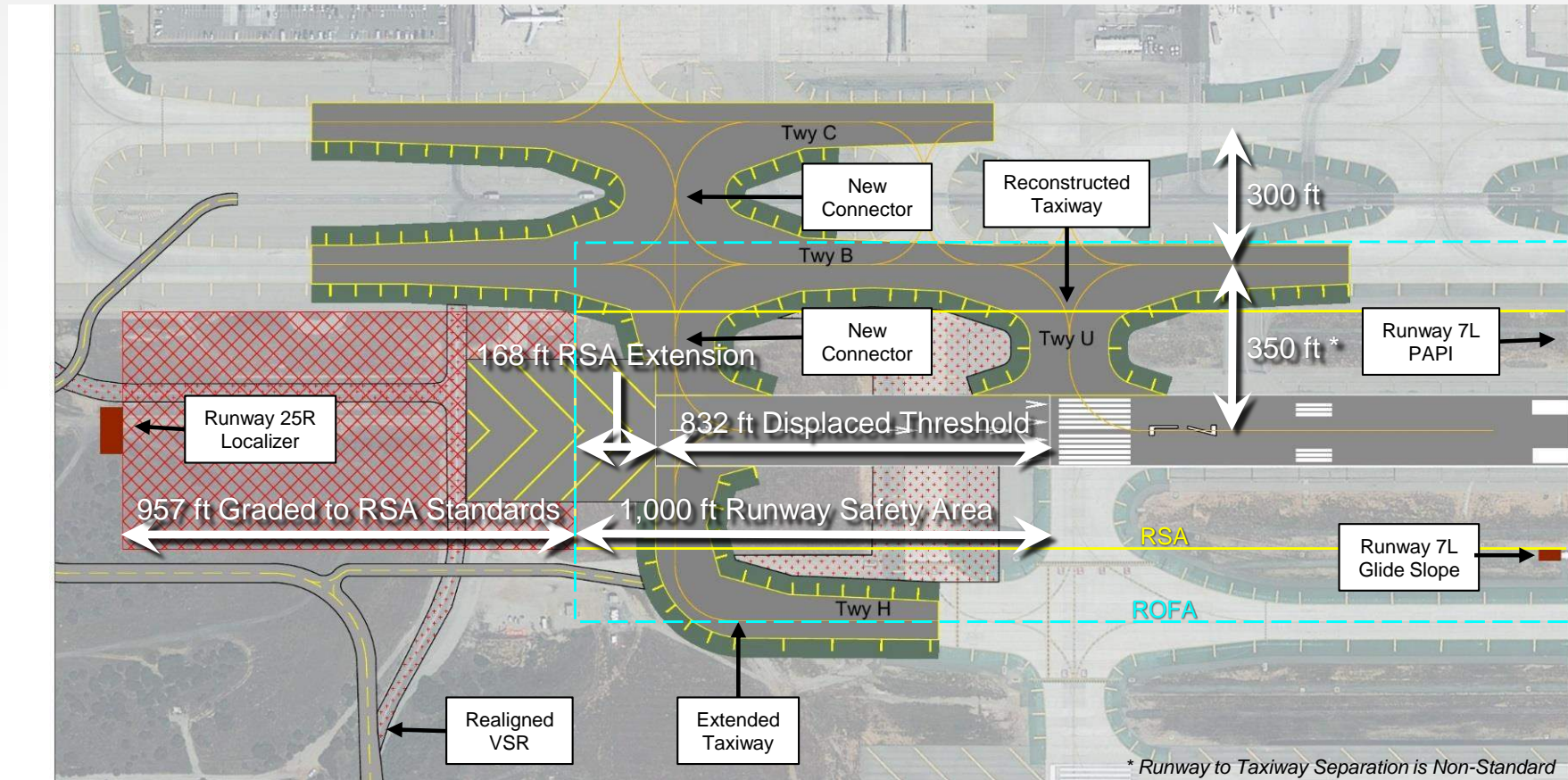
#### ATMP-AL010





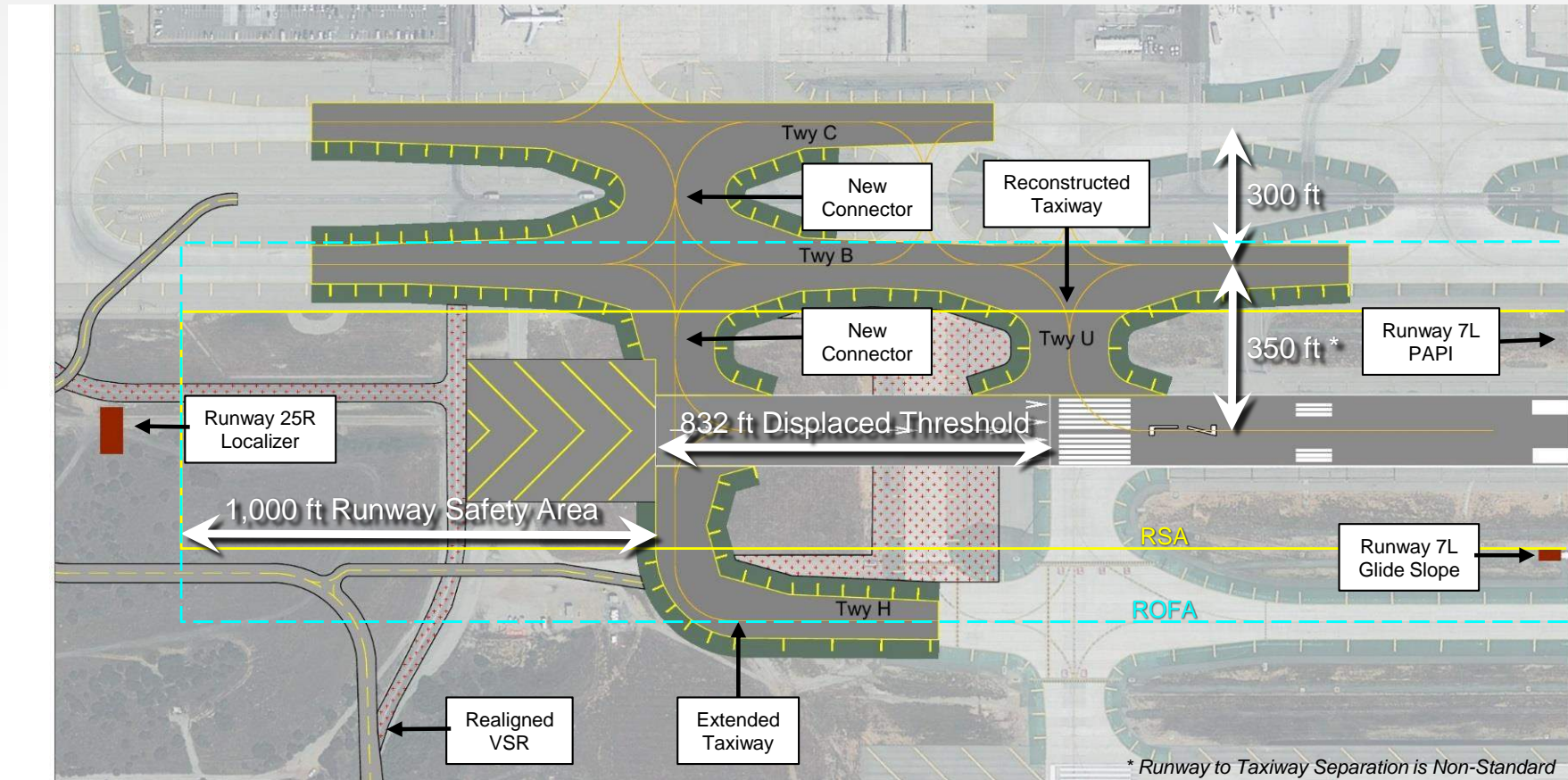
# Approved Alternative West End Geometry

**ATMP-AL010**



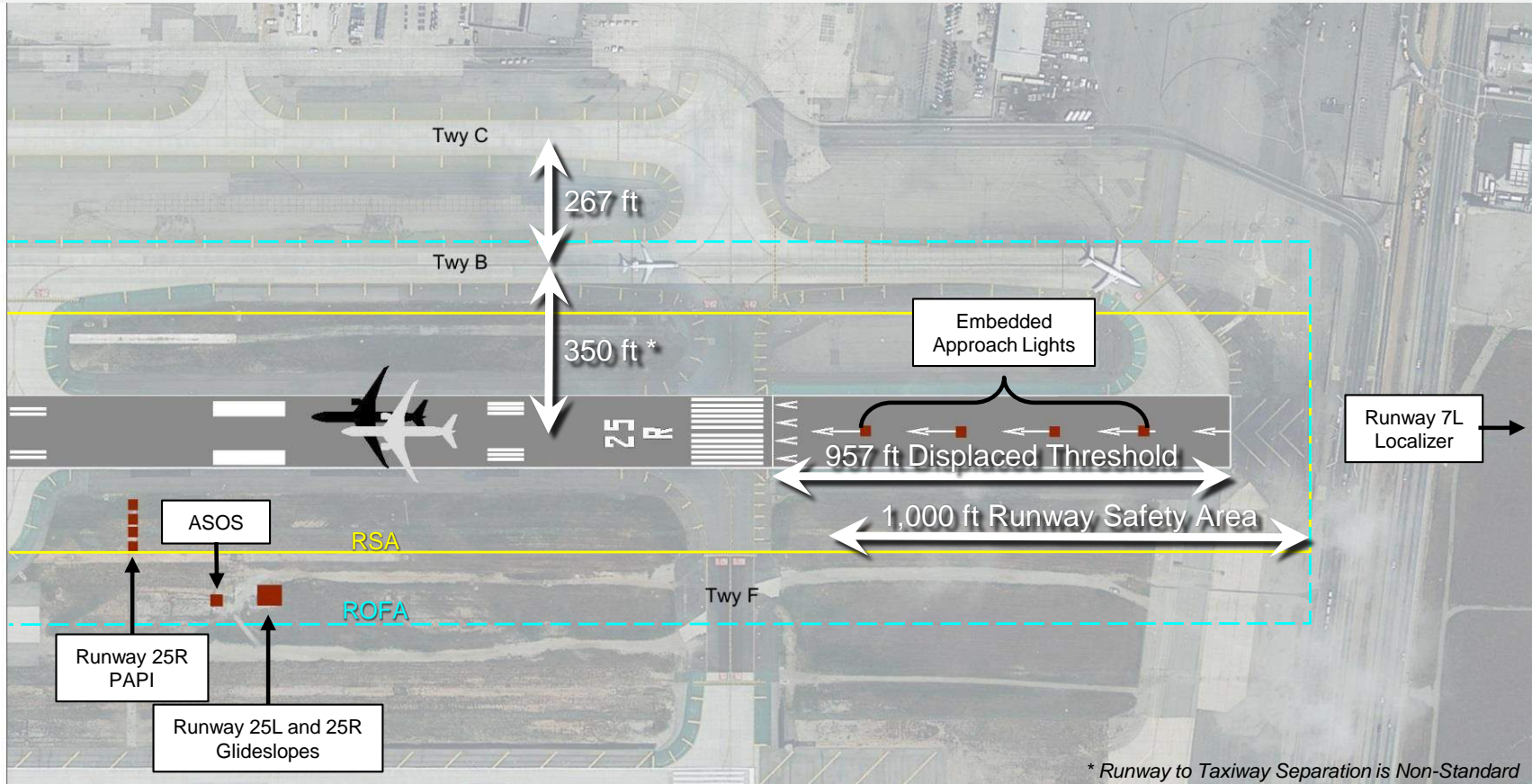
# Shift Alternative West End Geometry

**ATMP-AL010**



# Approved Alternative East End Geometry

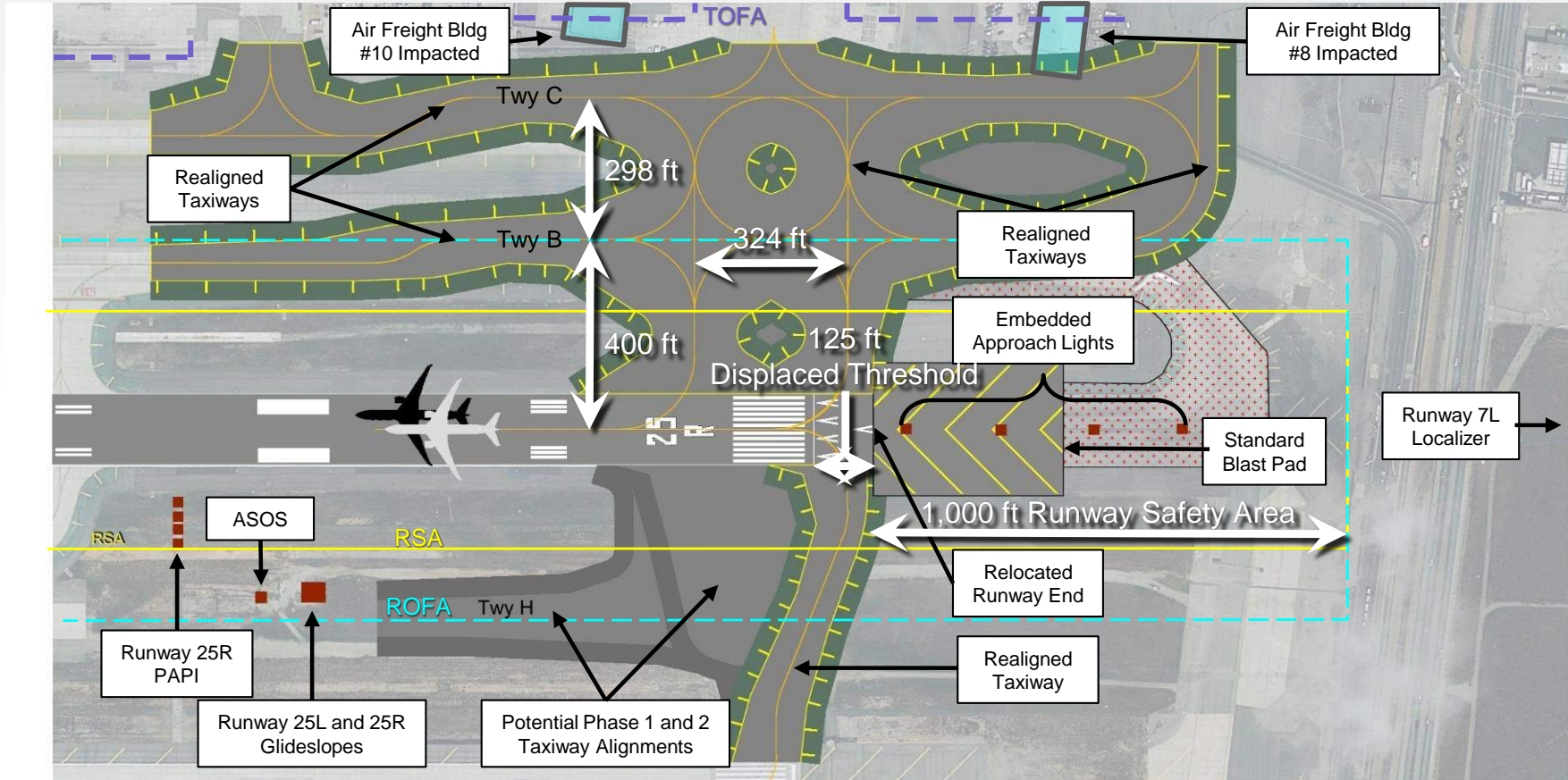
**ATMP-AL010**

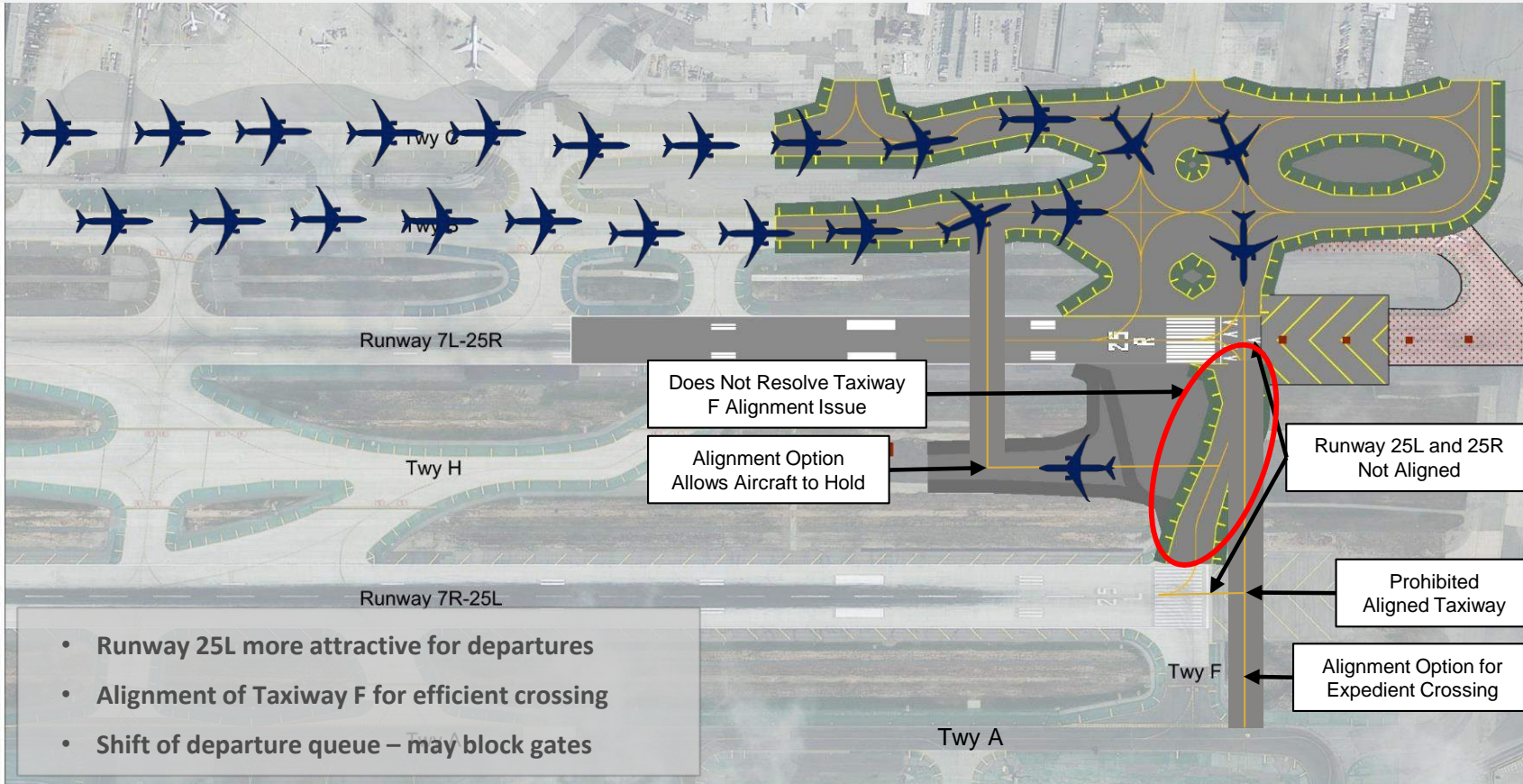


7

# Shift Alternative East End Geometry

ATMP-AL010





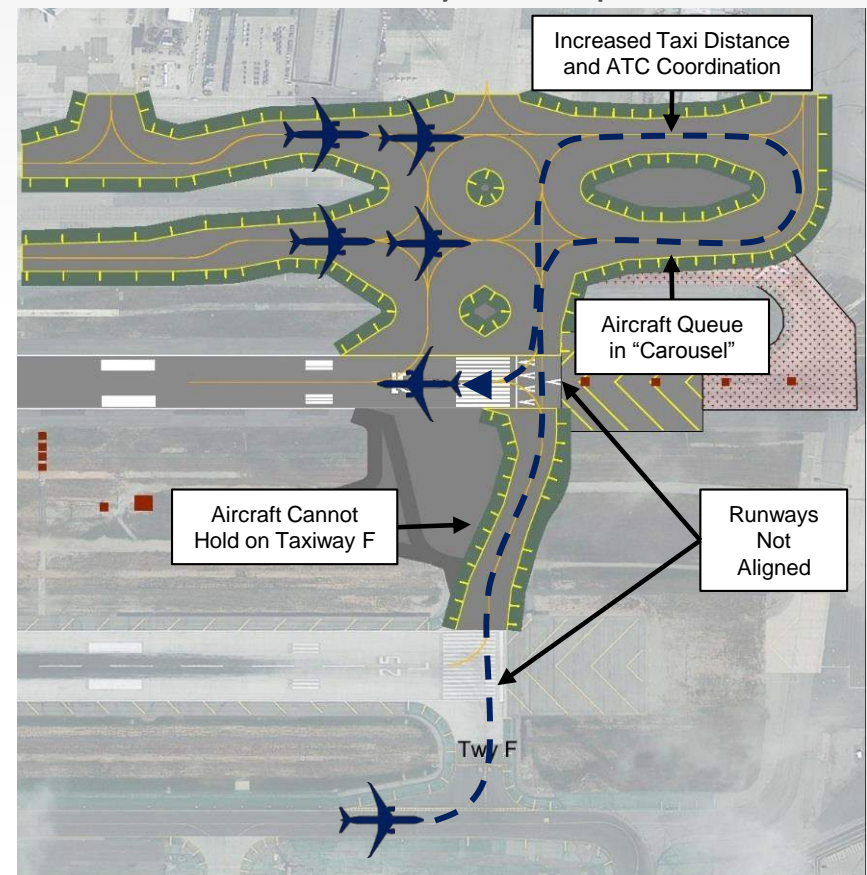
## Approved Alternative

- Challenging departure queuing



## Shift Alternative ATMP-AL010

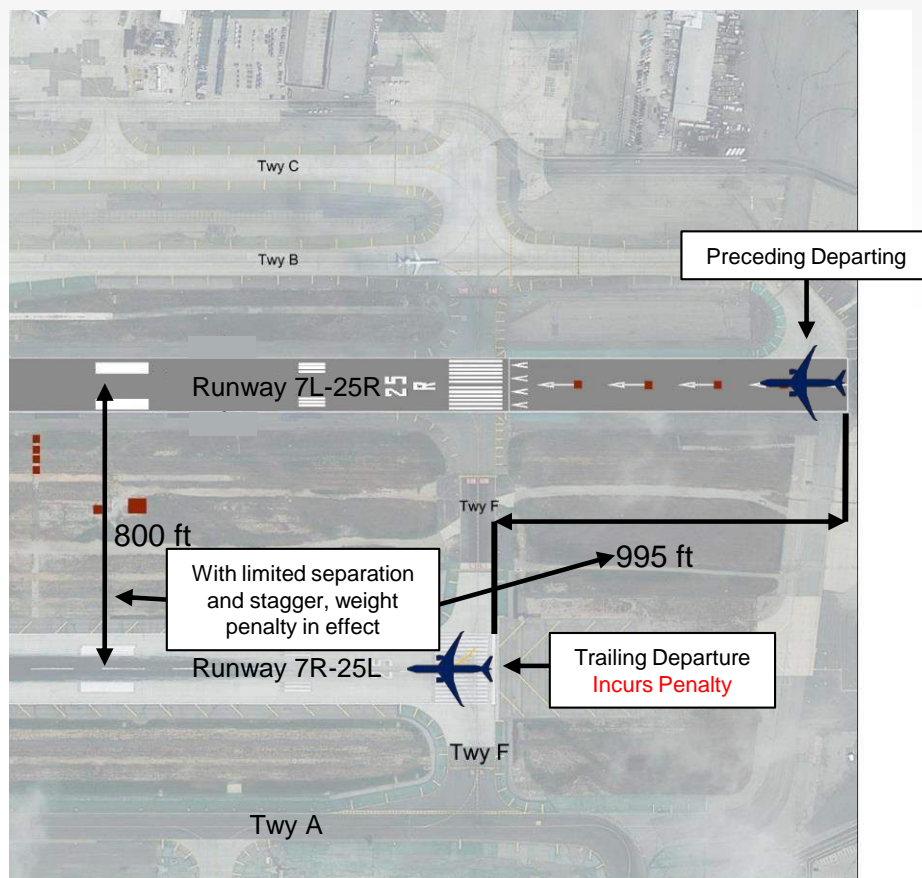
- More challenging departure queuing
- Unintended consequence: Potential increase in Runway 25L departures



# Operational Impacts Wake Turbulence Hold Times

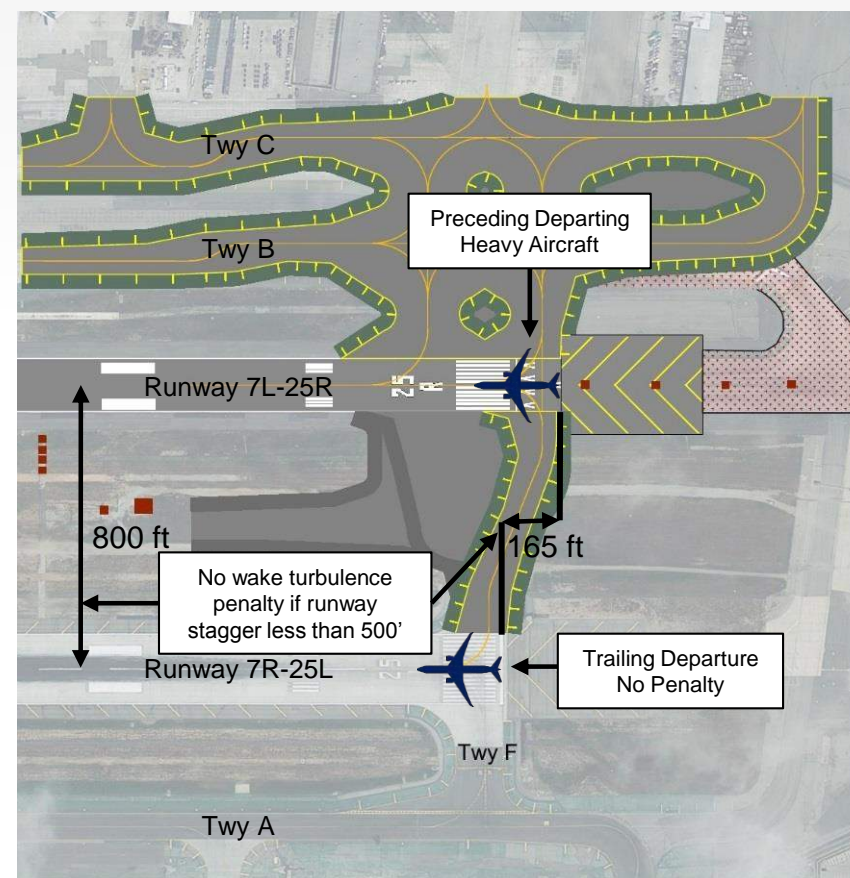
## Approved Alternative

- Wake turbulence penalties
- Incentive to use Runway 25R



## Shift Alternative

- Wake turbulence penalties removed
- No incentive to use Runway 25R



Survey letter included 3 questions –

- *“Will shifting Runway 7L-25R 832 feet to the west have an impact on your airline’s operation at LAX?”*
- *“How many flights are likely to be impacted as a result of the shift?”*
- *“What is your airline’s likely response to the impact of the shift (if any)?”*



## 12 Airline Engagement

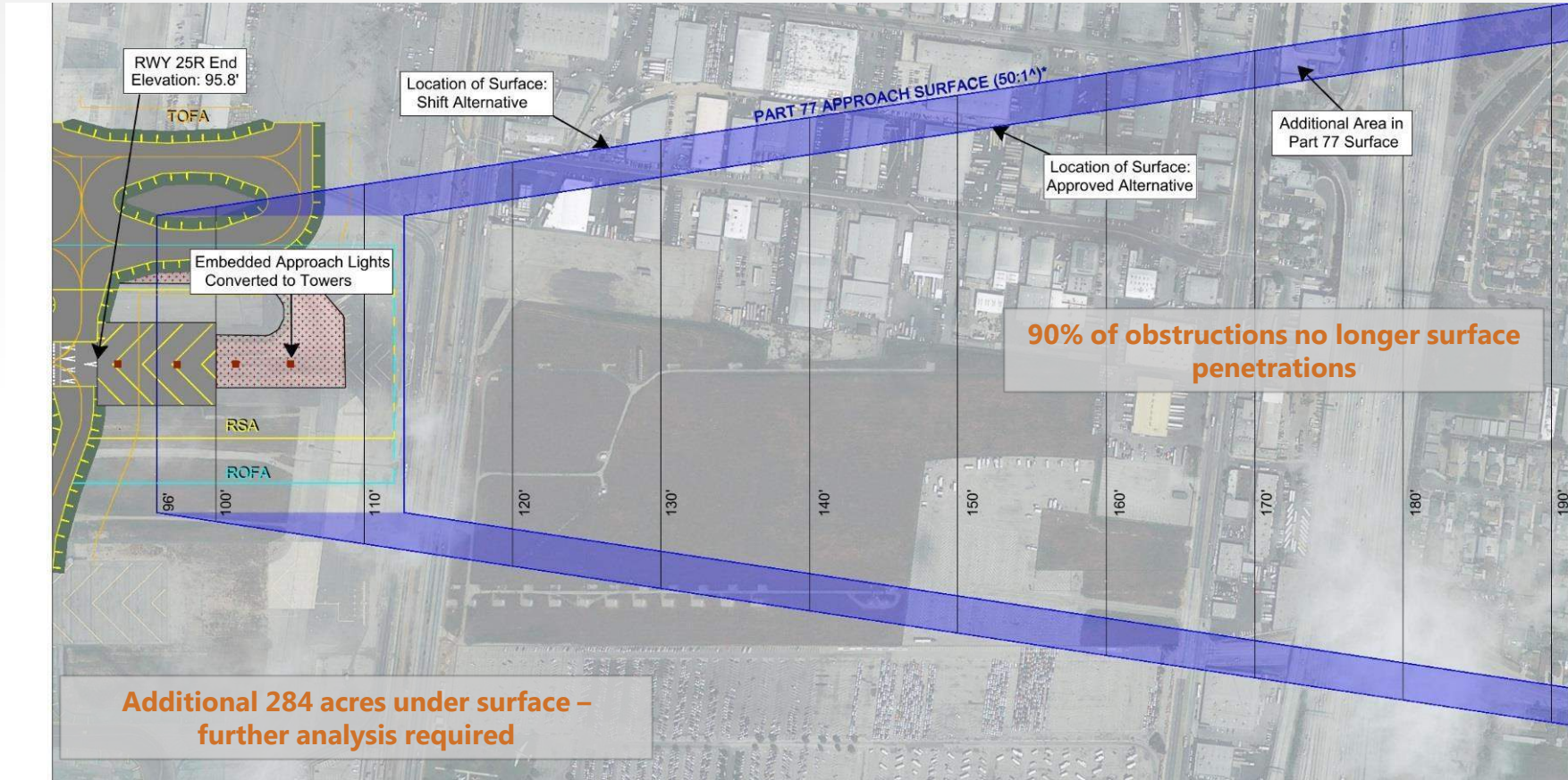
ATMP-AL010

- Response excerpts -
  - "...[we have] serious concerns on the impact to operations due to the runway shift."
  - "This amounts to about a 6,600 pound takeoff weight penalty and would not be acceptable for the operation of this aircraft from this runway."
- May encourage Runway 25L departures



# East End Obstructions Part 77 Approach Surface

ATMP-AL010



## VOR Relocation Feasibility

### Very High Frequency Omnidirectional Range

ATMP-AL010

- VOR
  - Navigational aid gives pilots relative location and direction heading
- LAX VOR with Tactical Air Navigation (VORTAC)
  - Supports military and civil use
  - “Lighthouse” for transpacific flights
  - 50+ instrument procedures dependent on this navigation aid
- Highest object in dunes
  - Impacts airline operational capability in Shift Alternative



## VOR Relocation Feasibility

### Very High Frequency Omnidirectional Range

**ATMP-AL010**

- Modify
  - Antenna and/or equipment shelter may be relocated
  - Relatively easy and inexpensive to implement
- Relocate
  - May be relocated elsewhere within LAX or off-Airport
  - Costly and time-consuming project
- Remove
  - Potential for other station in region to “pick up slack”
  - Not likely feasible



# Discussion

# **EXHIBIT**

**14**



*LOS ANGELES  
INTERNATIONAL AIRPORT*

*RUNWAY 7L-25R  
SHIFT STUDY*

*MARCH 2015*

Prepared for Los Angeles World  
Airports Environmental and Land  
Use Planning Division

Confidential Draft  
For Deliberative Purposes Only



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CHAPTER 1

*EXECUTIVE SUMMARY*

## 1.1 OVERVIEW

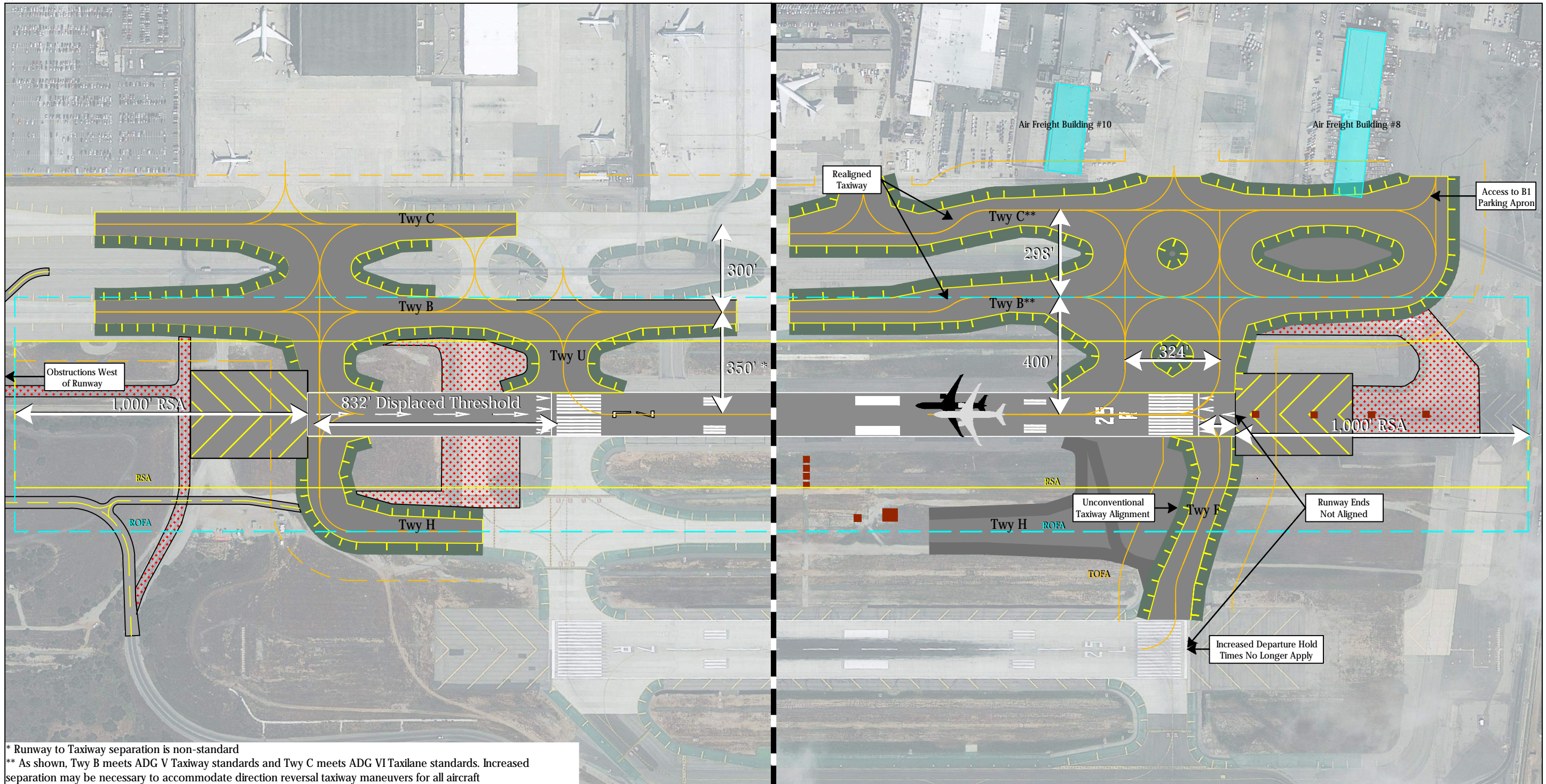
Los Angeles World Airports (LAWA) will be making improvements to the Runway Safety Area (RSA) for Los Angeles International Airport (LAX) Runway 7L-25R in response to a Federal mandate requiring airports to comply with Federal Aviation Administration (FAA) RSA standards by December 31, 2015.

Several alternatives were evaluated in 2012 and 2013 under the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) resulting in the selection of the Approved Alternative. A different alternative, the Shift Alternative, would result in an 832-foot westward shift of the Runway and would affect the boundary of the 65 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL) contour.

The Shift Alternative, as depicted in Figure 1-1, would also result in operational changes that were not previously evaluated in detail. Therefore, LAWA prepared this Runway 7L-25R Shift Study (Shift Study) analysis to assess the impacts and the feasibility of implementing the Shift Alternative. LAWA will implement the Approved Alternative to meet the FAA mandate but retains the option to implement the Shift Alternative, pending the results of the Shift Study.

Based on the results of the Shift Study analysis, the Shift Alternative is not recommended. There are several impacts associated with the Runway 7L-25R Shift Alternative:

- » Removal of departure hold times and challenging departure queuing potentially increases Runway 25L departures
- » Operational impacts on some long-haul departures from LAX and general lack of support for the Shift Alternative by surveyed airlines



\* Runway to Taxiway separation is non-standard  
\*\* As shown, Twy B meets ADG V Taxiway standards and Twy C meets ADG VI Taxiway standards. Increased separation may be necessary to accommodate direction reversal taxiway maneuvers for all aircraft

**Legend**

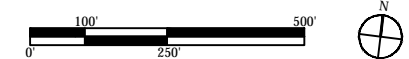
- Runway Safety Area (RSA)
- Runway Object Free Area (ROFA)
- Taxiway Object Free Area (TOFA)
- Navigational Aids (NAVAIDS)
- Pavement to be Removed

**Declared Distances**

| Operational Direction | TORA    | TODA    | LDA     | ASDA    |
|-----------------------|---------|---------|---------|---------|
| West Flow Rwy 25R     | 12,091' | 12,091' | 11,966' | 12,091' |
| East Flow Rwy 7L      | 12,091' | 12,091' | 11,259' | 12,091' |

TORA - Takeoff Run Available  
ASDA - Accelerate Stop Distance Available  
TODA - Takeoff Distance Available  
LDA - Landing Distance Available

**Figure 1-1:  
Shift Alternative Conditions**



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## 1.2 ANALYSES/EVALUATION

The Shift Study analysis evaluated the impacts and feasibility of implementing the Shift Alternative. The study evaluated potential impacts related to airport operations and provided a more detailed description of changes to LAX Runway 7L-25R required to implement the Shift Alternative. The Shift Alternative would require relocation of the east endpoint of the Runway 832 feet west and would require modifications to Taxiway F, Taxiway B, and Taxiway C to maintain access to the relocated runway end.

### Runway 25R and Runway 25L Departure Coordination

The ends of Runway 25L and Runway 25R are staggered by approximately 1,000 feet today, a condition that would not change under the Approved Alternative. The runway stagger requires aircraft that depart from Runway 25L to accept additional departure hold time after large aircraft depart Runway 25R. These FAA mandated hold times are in place as a result of the staggered runway configuration. The Shift Alternative would reduce the stagger between the runways to approximately 165 feet and would eliminate the required hold time. The required hold time incentivizes aircraft to depart Runway 25R instead of Runway 25L and would remain in the Approved Alternative. The Shift Alternative would eliminate the required hold time for Runway 25L departures and would, therefore, eliminate an incentive to depart Runway 25R in lieu of Runway 25L. The result may lead to an increase in Runway 25L departures with the implementation of the Shift Alternative.

### Taxiways

Taxiway F would need to be realigned to connect the two runway ends. The realignment would change taxi and queueing operations for Runway 25R departures. Taxiway F would continue to provide access between Taxiway A and Taxiway B. A curved segment between the ends of Runway 25R and Runway 25L is required because the Shift Alternative would not align the two runway ends. The curved segment of Taxiway F between the runway ends is unconventional and would result in operational complexities for Runway 25R departures. The added complexity may increase the number of departures from Runway 25L in lieu of Runway 25R departures.

### Airplane Takeoff Performance and Obstructions West of the Runway

Nine airlines were surveyed regarding the Shift Alternative. Six of the nine airlines indicated that the Shift Alternative would negatively impact their operations.

The impact to airplane takeoff performance results from relocating the Runway 25R endpoint 832 feet west, closer to obstructions in the dunes west of the Runway. While the runway length would not change, the location of the start of takeoff roll would be closer to the terrain and obstructions west of the Runway.

Airlines indicated that payload reductions would be required to depart Runway 25R if the Shift Alternative were implemented. Payload reductions result in lost revenue. Lost revenue may result in some routes no longer being able to operate profitably which could force airlines to discontinue operation of some flights reducing LAX's economic benefit to the Los Angeles region. Alternatively, an airline may request departure from a different runway to minimize operational impacts resulting from the Shift Alternative.

## Taxi Queues

Relocating the Runway 25R endpoint 832 feet west would result in shifting the departure queue farther west. The westerly shift of the Runway 25R departure queue would result in increased taxiway congestion near Terminal 7 and Terminal 8 during peak departure periods.

## 1.3 CONCLUSIONS

The Shift Alternative is not recommended for implementation. The Shift Alternative could increase Runway 25L departures resulting from changes to the runway and taxiway geometry on the South Airfield. The Shift Alternative would impact airline operations by moving the endpoint of Runway 25R closer to obstructions west of the Airport. The Shift Alternative may result in airlines discontinuing some long-haul international flights or using a different runway for departure. The Shift Alternative would also impact LAX operations by increasing the potential for congestion near Terminal 7 and Terminal 8.

The Approved Alternative will be implemented. A key LAWA objective is to minimize Runway 25L aircraft departures to the extent practicable. The potential increase in Runway 25L departures that may result from the Shift Alternative is an unintended consequence that may negate the noise benefits of the Shift Alternative as articulated in the CEQA and NEPA analysis. With the implementation of the Approved Alternative, an option to further minimize Runway 25L departures is to extend Taxiway C to Taxiway B1 to provide air traffic control with enhanced ability to maneuver and queue aircraft for departure from Runway 25R.

There is only a single access point to Runway 25R from Taxiway B in the Approved Alternative (as well as in the existing condition). Extending Taxiway C to Taxiway B1 may enhance FAA air traffic control's ability to use Runway 25R for departures in lieu of Runway 25L by providing a second access point to the Runway 25R end. The Taxiway C extension would ease air traffic control's ability to transition aircraft from Taxiway A to a departure queue on Taxiway B and Taxiway C.



CHAPTER 2

*PROJECT DEFINITION*

## 2.1 PROJECT DESCRIPTION AND LAYOUT

Los Angeles World Airports (LAWA) will be making improvements to the Runway Safety Area (RSA) for Los Angeles International Airport (LAX or the Airport) Runway 7L-25R. This in response to a United States Congressional mandate requiring airports to improve RSAs to comply with Federal Aviation Administration (FAA) standards by December 31, 2015.

LAWA and its consultants evaluated several alternatives for providing a standard RSA for Runway 7L-25R and prepared environmental documents under the California Environmental Quality Act (CEQA) and National Environmental Policy Act (NEPA) in 2012 and 2013. One of the alternatives, the Shift Alternative, evaluated an 832-foot westward shift of the Runway. Analysis of the Shift Alternative indicated that shifting the Runway west would affect the boundary of the 65 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL) noise contour<sup>1</sup>. The shift in the noise contour may result in fewer residences within the 65 dBA CNEL. Hence, some community members favored the Shift Alternative relative to other RSA alternatives that would not shift the noise contour. However, the Shift Alternative requires a number of operational changes that had not been evaluated in detail. For this reason, LAWA selected a different alternative, the Approved Alternative that has fewer unknown operational impacts.

LAWA intends to implement the Approved Alternative within the next few years and retains the option to convert to the Shift Alternative, pending the results of the Shift Study. The analysis of the Shift Alternative is the focus of this study.

This study evaluates the impacts of the Shift Alternative in terms of aircraft performance, obstacle clearance, and how the shifted runway affects airfield operations at LAX. It should be noted that the Shift Alternative is compared to the Approved Alternative, approved in the *2013 Finding of No Significant Impact and Record of Decision for Proposed Runway 7L-25R Safety Area Project and Associated Improvements* (2013 FONSI) and the *2014 Final Environmental Impact Report for Runway 7L-25R Runway Safety Area and Associated Improvements Project* (2014 Final EIR). The Shift Alternative is not compared to existing conditions ("existing conditions" refers to conditions of Runway 7L-25R as of September 2014). The Approved Alternative and the Shift Alternative are described in this chapter.

### 2.1.1 Runway Safety Area and Declared Distances

An RSA is a defined surface surrounding the runway prepared or suitable for reducing the risk of damage to aircraft in the event of an undershoot, overrun, or excursion from the runway. Standard dimensions for an RSA for a runway serving large commercial aircraft are 1,000 feet beyond the departure end of runway and 600 feet prior to the arrival threshold. Declared Distances may be used as an alternative method to achieve a standard RSA in cases where it is not practicable to achieve a full-dimensional RSA.

Declared Distances are runway distances declared by the airport owner available for a turbine-powered aircraft. Declared Distances represent the maximum distances available and suitable for achieving takeoff,

<sup>1</sup> Final Environmental Assessment of Proposed Runway 7L-25R Runway Safety Area and Associated Improvements Project, URS Corporation and Ricondo and Associates, Inc., August 2013

rejected takeoff, and landing distances performance requirements for turbine-powered aircraft. The Declared Distances are Takeoff Run Available (TORA) and Takeoff Distance Available (TODA), which apply to takeoff; Accelerate-Stop Distance Available (ASDA), which applies to a rejected takeoff; and Landing Distance Available (LDA), which applies to landing.

## 2.1.2 Approved Alternative

The Approved Alternative, as depicted in *Figure 2-1* and *Figure 2-2*, was the result of numerous previous RSA and environmental studies. The Approved Alternative was further evaluated in the environmental documentation previously completed. The Approved Alternative was selected as the most appropriate and feasible option because it minimizes the following: operational impacts in the long-term; operational impacts during construction; construction costs; and environmental impacts.

The Approved Alternative runway length is 12,923 feet. *Table 2-1* describes the Approved Alternative Declared Distances.

**TABLE 2-1:  
APPROVED ALTERNATIVE DECLARED DISTANCES**

|            | Runway 25R<br>Operational Direction | Runway 7L<br>Operational Direction |
|------------|-------------------------------------|------------------------------------|
| TORA (ft.) | 12,091                              | 12,091                             |
| TODA (ft.) | 12,091                              | 12,091                             |
| ASDA (ft.) | 12,091                              | 12,091                             |
| LDA (ft.)  | 11,134                              | 11,259                             |

Source: RS&H, 2015

Notes: TORA - Takeoff Run Available, TODA – Takeoff Distance Available,  
ASDA – Accelerate-Stop Distance Available, LDA – Landing Distance  
Available

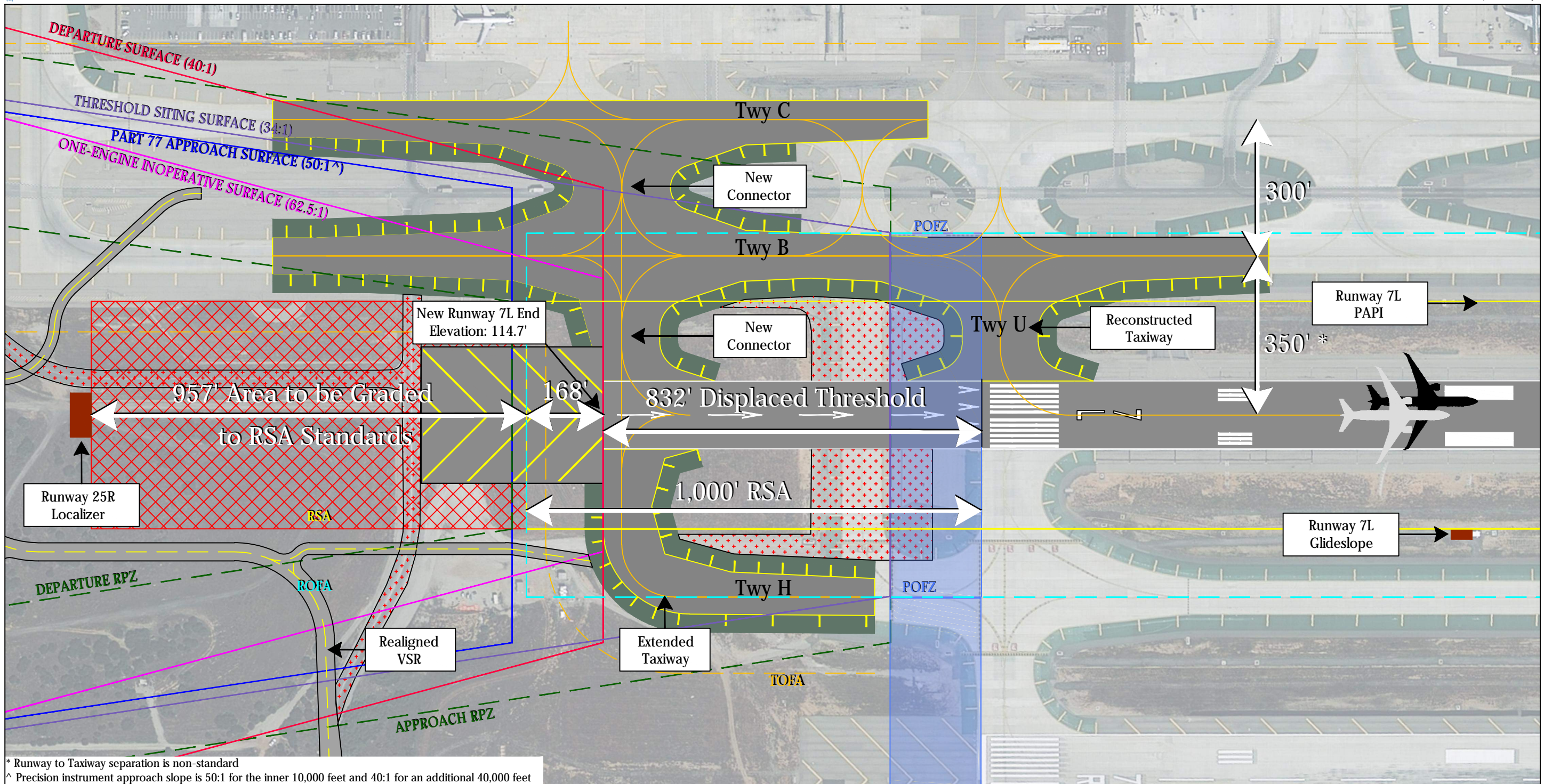
Per the 2013 FONSI, an additional area 957 feet long and 500 feet wide beyond the west end of the RSA will be graded to RSA standards to enable the implementation of the Shift Alternative pending the results of operational analysis.

The location of the FAA Terminal Instrument Procedures (TERPS) Departure Surface and One-Engine Inoperative Surface was based on the FAA Airspace Review of proposed development of the West Aircraft Maintenance Area.

## 2.1.3 Shift Alternative

The Shift Alternative, as depicted in *Figure 2-3* and *Figure 2-4*, proposes shifting the Runway 25R endpoint 832 feet to the west relative to the Approved Alternative. The Runway 25R arrival threshold is not relocated resulting in a 125-foot displaced threshold on the east end of the Runway. The Runway 7L endpoint and threshold is not relocated relative to the Approved Alternative. A full-dimensional RSA is provided on each runway end.

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**Legend**

- Runway Safety Area (RSA)
- Runway Object Free Area (ROFA)
- Taxiway Object Free Area (TOFA)
- Precision Obstacle Free Zone (POFZ)
- Navigational Aids (NAVAIDS)
- Runway Protection Zone (RPZ)
- Departure Surface
- Part 77 Approach Surface
- One-Engine Inoperative Surface
- Threshold Siting Surface
- Pavement to be Removed

**Declared Distances**

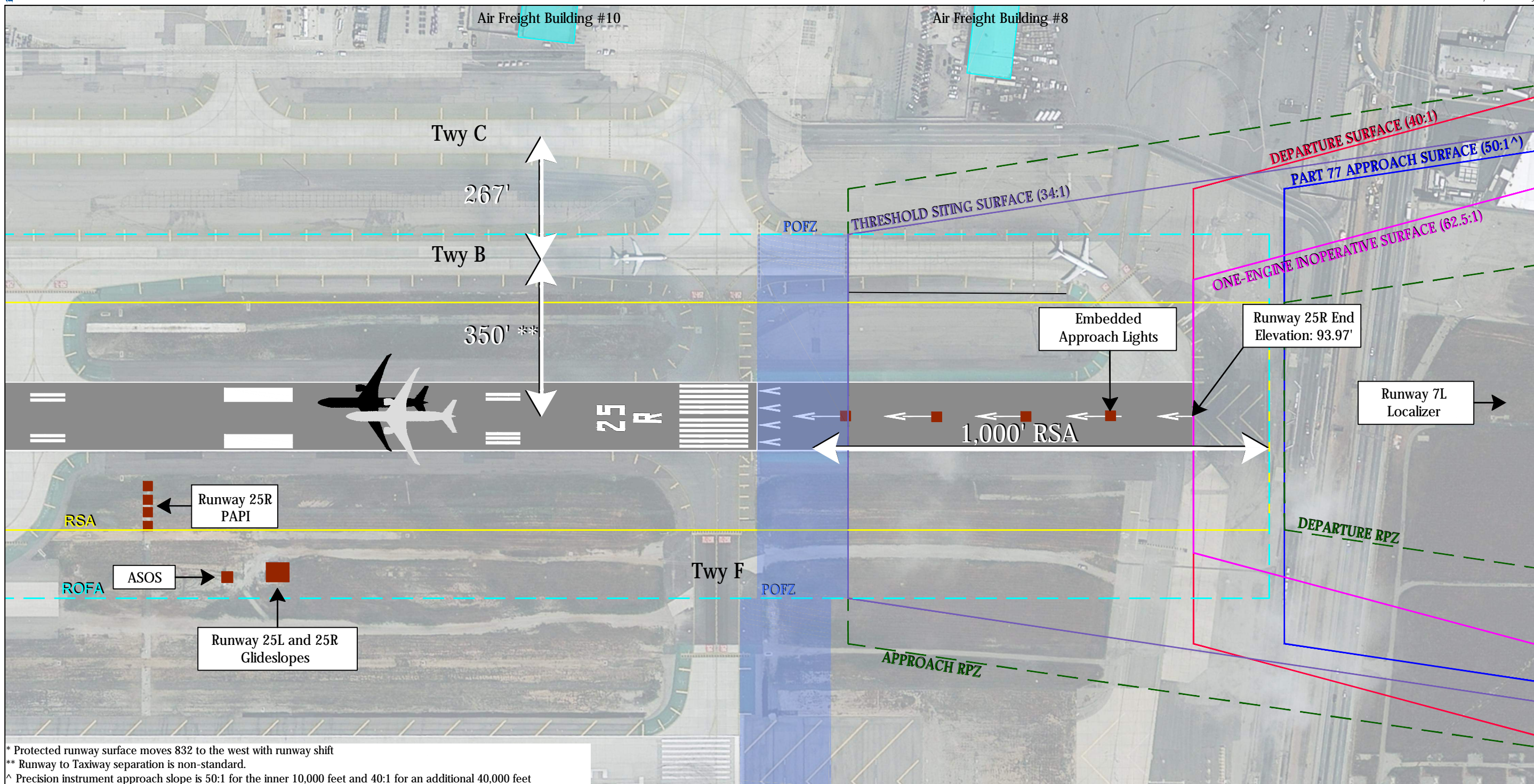
| Operational Direction | TORA    | TODA    | LDA     | ASDA    |
|-----------------------|---------|---------|---------|---------|
| West Flow Rwy 25R     | 12,091' | 12,091' | 11,134' | 12,091' |
| East Flow Rwy 7L      | 12,091' | 12,091' | 11,259' | 12,091' |

TORA - Takeoff Run Available  
ASDA - Accelerate Stop Distance Available  
TODA - Takeoff Distance Available  
LDA - Landing Distance Available

**Figure 2-1:**  
Approved Alternative Runway 7L (West)



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**Legend**

- Runway Safety Area (RSA)
- Runway Object Free Area (ROFA)
- Taxiway Object Free Area (TOFA)
- Precision Obstacle Free Zone (POFZ)
- Navigational Aids (NAVAIDS)
- Runway Protection Zone (RPZ)
- Departure Surface
- Part 77 Approach Surface
- One-Engine Inoperative Surface
- Threshold Siting Surface

**Declared Distances**

| Operational Direction | TORA    | TODA    | LDA     | ASDA    |
|-----------------------|---------|---------|---------|---------|
| West Flow Rwy 25R     | 12,091' | 12,091' | 11,134' | 12,091' |
| East Flow Rwy 7L      | 12,091' | 12,091' | 11,259' | 12,091' |

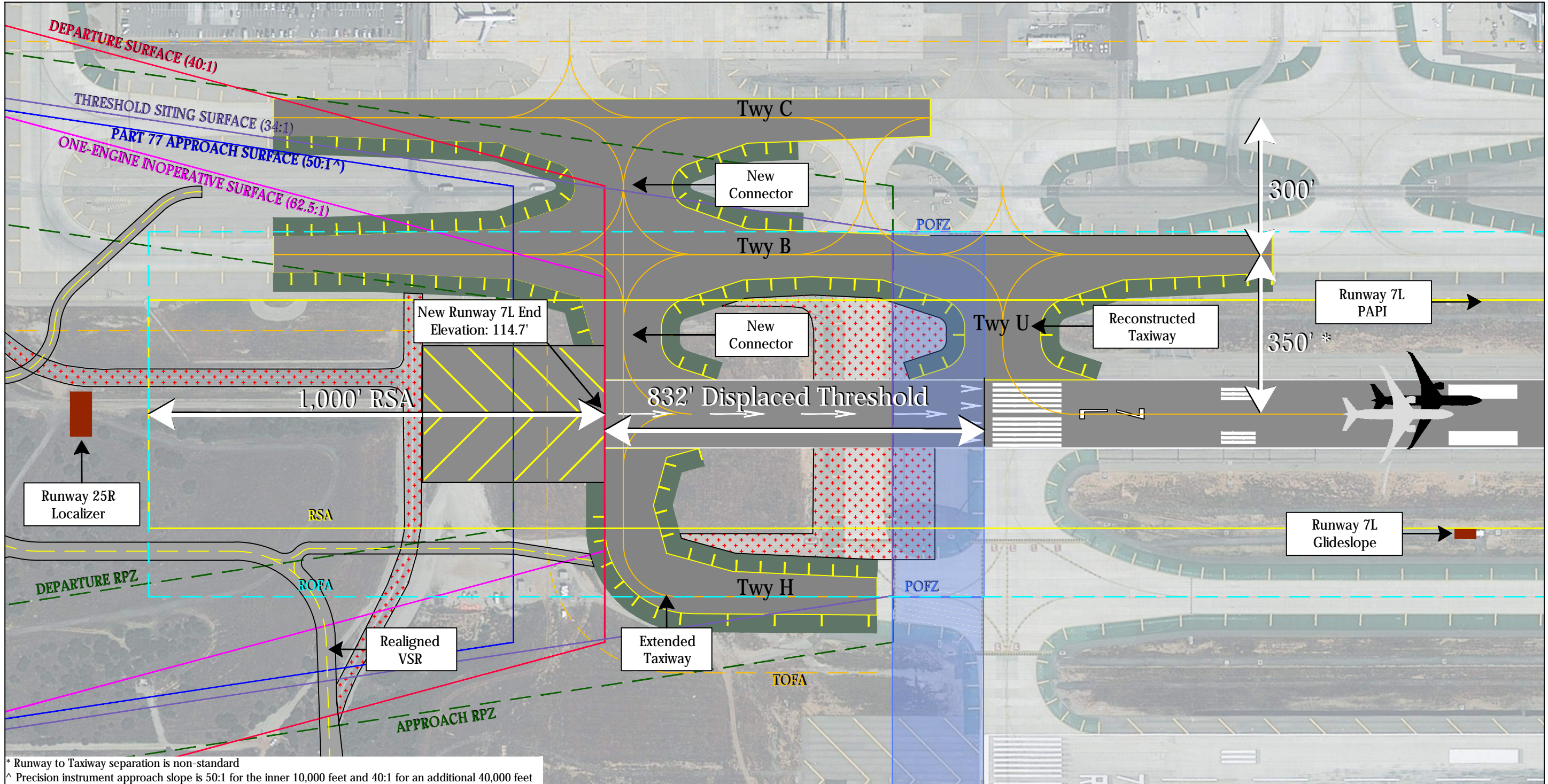
TORA - Takeoff Run Available  
 ASDA - Accelerate Stop Distance Available  
 TODA - Takeoff Distance Available  
 LDA - Landing Distance Available

**Figure 2-2:**  
Approved Alternative Runway 25R (East)



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\* Runway to Taxiway separation is non-standard  
 ^ Precision instrument approach slope is 50:1 for the inner 10,000 feet and 40:1 for an additional 40,000 feet

**Legend**

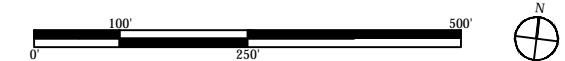
- Runway Safety Area (RSA)
- Runway Object Free Area (ROFA)
- Taxiway Object Free Area (TOFA)
- Precision Obstacle Free Zone (POFZ)
- Navigational Aids (NAVAIDS)
- Runway Protection Zone (RPZ)
- Departure Surface
- Part 77 Approach Surface
- One-Engine Inoperative Surface
- Threshold Siting Surface
- Pavement to be Removed

**Declared Distances**

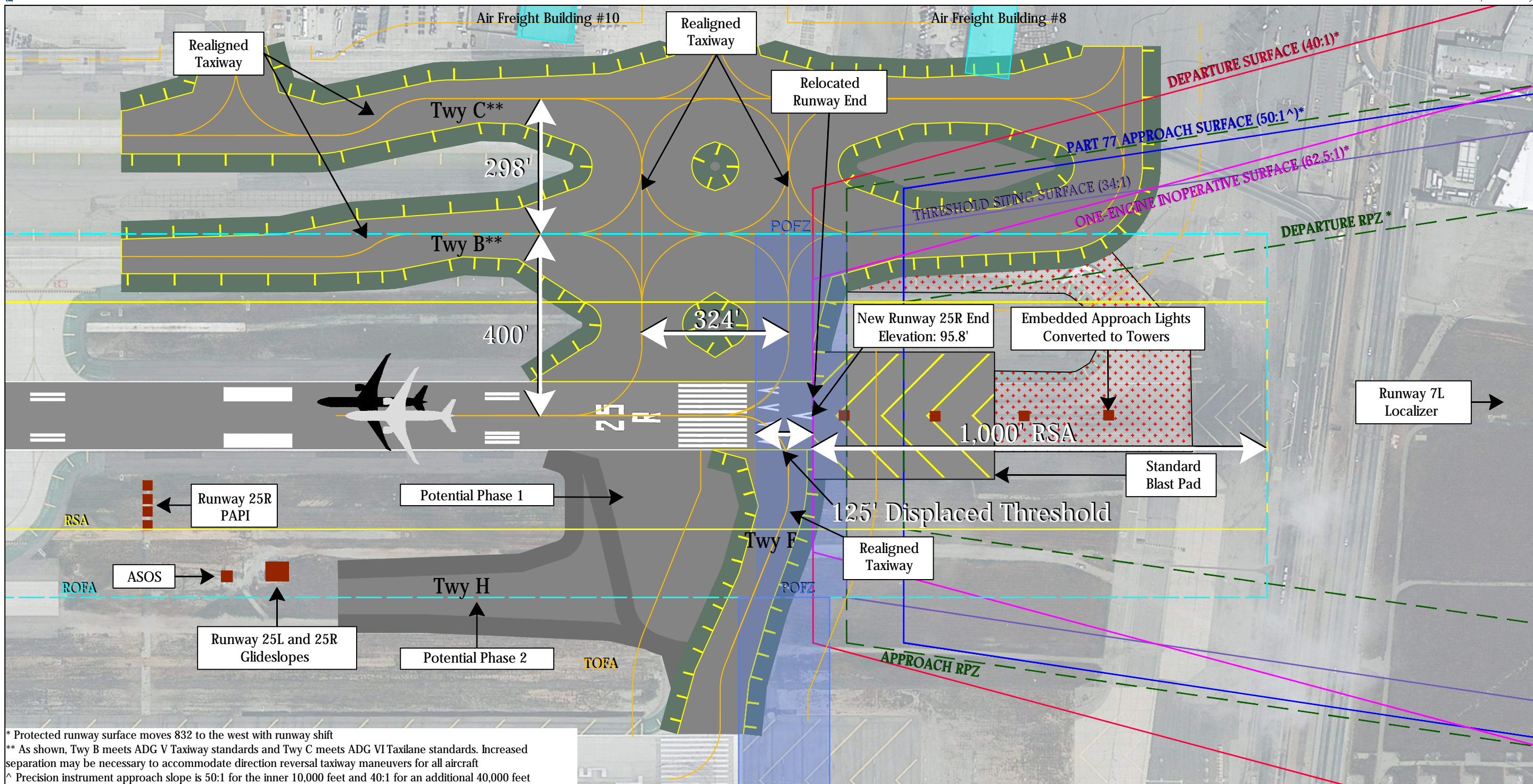
| Operational Direction | TORA    | TODA    | LDA     | ASDA    |
|-----------------------|---------|---------|---------|---------|
| West Flow Rwy 25R     | 12,091' | 12,091' | 11,966' | 12,091' |
| East Flow Rwy 7L      | 12,091' | 12,091' | 11,259' | 12,091' |

TORA - Takeoff Run Available  
 ASDA - Accelerate Stop Distance Available  
 TODA - Takeoff Distance Available  
 LDA - Landing Distance Available

**Figure 2-3:**  
Shift Alternative Runway 7L (West)



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\* Protected runway surface moves 832 to the west with runway shift  
 \*\* As shown, Twy B meets ADG V Taxiway standards and Twy C meets ADG VI Taxiway standards. Increased separation may be necessary to accommodate direction reversal taxiway maneuvers for all aircraft  
 ^ Precision instrument approach slope is 50:1 for the inner 10,000 feet and 40:1 for an additional 40,000 feet

**Legend**

- Runway Safety Area (RSA)
- Runway Object Free Area (ROFA)
- Taxiway Object Free Area (TOFA)
- Precision Obstacle Free Zone (POFZ)
- Navigational Aids (NAVAIDS)
- Runway Protection Zone (RPZ)
- Departure Surface
- One-Engine Inoperative Surface
- Threshold Siting Surface
- Pavement to be Removed

**Declared Distances**

| Operational Direction | TORA    | TODA    | LDA     | ASDA    |
|-----------------------|---------|---------|---------|---------|
| West Flow Rwy 25R     | 12,091' | 12,091' | 11,966' | 12,091' |
| East Flow Rwy 7L      | 12,091' | 12,091' | 11,259' | 12,091' |

TORA - Takeoff Run Available  
 ASDA - Accelerate Stop Distance Available  
 TODA - Takeoff Distance Available  
 LDA - Landing Distance Available

**Figure 2-4:**  
Shift Alternative Runway 25R (East)



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The Shift Alternative runway length is 12,091 feet. *Table 2-2* describes the Shift Alternative Declared Distances.

**TABLE 2-2:  
SHIFT ALTERNATIVE DECLARED DISTANCES**

|            | Runway 25R<br>Operational Direction | Runway 7L<br>Operational Direction |
|------------|-------------------------------------|------------------------------------|
| TORA (ft.) | 12,091                              | 12,091                             |
| TODA (ft.) | 12,091                              | 12,091                             |
| ASDA (ft.) | 12,091                              | 12,091                             |
| LDA (ft.)  | 11,966                              | 11,259                             |

Source: RS&H, 2015

Notes: TORA - Takeoff Run Available, TODA – Takeoff Distance Available,  
ASDA – Accelerate-Stop Distance Available, LDA – Landing Distance  
Available

The Navigational Aids (NAVAIDs) and taxiways at the west end of the Runway are not changed relative to the Approved Alternative. Some taxiways and NAVAIDs at the east end of the Runway are modified relative to the Approved Alternative. The Shift Alternative features the following changes to NAVAIDs, taxiways, and associated infrastructure relative to the Approved Alternative:

- » A portion of the embedded Medium Intensity Approach Lighting System with Runway Alignment Indicator Lights (MALSR) system is converted to towers.
- » A portion of Taxiway B is reconstructed 50 feet north to meet the Airplane Design Group (Group) V parallel runway to taxiway separation standard. Taxiway B would extend east along its relocated centerline beyond the Runway 25R end to provide access to the B1 parking apron.
- » A portion of Taxiway C is reconstructed 298 feet north of the relocated Taxiway B centerline to meet the Group VI parallel taxiway separation standards. Taxiway C is extended east along its relocated centerline beyond the Runway 25R end to provide access to the B1 parking apron. The realignment of this Taxiway affects two existing facilities – Air Freight Building #8 and Air Freight Building #10 – requiring the partial or full demolition of those facilities.
- » Taxiway F is realigned between the Runway 25L endpoint and the new Runway 25R endpoint to connect to both Runway ends via a standard right-angle intersection as described in FAA Advisory Circular 150/5300-13A, Airport Design.
- » A bypass taxiway is constructed 324 feet west of Taxiway F to provide redundant access to the Runway 25R end from Taxiway C and Taxiway B.
- » The bypass taxiway may be extended south in the future to connect to the Runway 25L endpoint. Realigned Taxiway F and bypass taxiway may include a stub-out to the west to support the possible future connection to Taxiway H. Currently the Runway 25L and Runway 25R glideslope equipment and Automated Surface Observing System (ASOS) equipment prevents this connection.

- » A standard blast pad is constructed at the east end of the new Runway 25R endpoint.

The Runway Protection Zones and protected surfaces on the west end of Runway 7L-25R are not changed relative to the Approved Alternative. The Shift Alternative features the following changes to Runway Protection Zones and protected surfaces on the east end of the Runway relative to the Approved Alternative:

- » The TERPS Departure Surface shifts 832 feet to the west to align with the new Runway 25R endpoint (end of TODA).
- » The Part 77 Approach Surface shifts 832 feet to the west to align 200 feet east of the new Runway 25R endpoint (end Part 77 Primary Surface).
- » The One-Engine Inoperative Obstacle Clearing Surface shifts 832 feet to the west to align with the new Runway 25R endpoint.
- » The Departure Runway Protection Zone shifts 832 feet west align 200 feet east of the new Runway 25R endpoint.

The Approach Runway Protection Zone and Threshold Siting Surface for Runway 25R would not change relative to the Approved Alternative.

*Table 2-3* summarizes the changes between the Approved Alternative and Shift Alternative.

**TABLE 2-3:  
SHIFT ALTERNATIVE FEATURES COMPARED TO APPROVED ALTERNATIVE**

| Project Element   | West End Condition | East End Condition  |
|---|--------------------|---|
| Taxiway B   | No change          | Portion reconstructed 50 feet north<br>Extended east along relocated centerline                     |
| Taxiway C   | No change          | Portion reconstructed 298 feet north of relocated Twy B<br>Extended east along relocated centerline |
| Taxiway H   | No change          | Stub-out for connection to Taxiway F (Future)   |
| Taxiway F   | n/a                | Realigned north of Runway 25L<br>Bypass taxiway constructed 324 feet west of Taxiway F              |
| Taxiway U   | No change          | n/a   |
| Runway Endpoint   | No change          | Relocated 832 feet west   |
| Runway Threshold  | No change          | No change   |
| Runway Blast Pad  | No change          | Relocated / reconstructed to standard   |
| Runway Safety Area                                      | Full-dimensional   | Full-dimensional  |
| Runway Object Free Area                                 | Full-dimensional   | Full-dimensional  |
| Approach<br>Runway Protection Zone                      | No change          | No change   |
| Departure<br>Runway Protection Zone                     | No change          | Relocated 832 feet west   |
| Part 77 Approach Surface                                | No change          | Relocated 832 feet west   |
| Threshold Siting Surface                                | No change          | No change   |
| TERPS Departure Surface                                 | No change          | Relocated 832 feet west   |
| One-Engine Inoperative<br>Obstacle Clearing Surface     | No change          | Relocated 832 feet west   |
| Instrument Landing System<br>(Localizer and Glideslope) | No change          | No change   |
| Approach Lighting System                                | No change          | Partially rebuilt in place  |
| Vertical Guidance (PAPI)                                | No change          | No change   |

Source: RS&H, 2015

## 2.2 RUNWAY 7L-25R AND AIRFIELD CONTEXT

Runway 7L-25R has an important role within the four-runway system at the Airport. Runway length, proximity to general aviation and air cargo facilities, proximity to Terminals 4 through 8, and adherence to the Preferential Runway Use Policy (PRUP) contribute to Runway 7L-25R being the most frequently used departure runway at the Airport.

The Airport's four-runway system is separated into two areas of parallel runways: the North Airfield complex and the South Airfield complex. The North Airfield complex is comprised of Runway 6L-24R at 8,925 feet in length and Runway 6R-24L at 10,285 feet in length. The South Airfield complex is comprised of Runway 7L-25R at 12,091 feet in length and Runway 7R-25L at 11,095 feet in length.

### 2.2.1 Preferential Runway Use Policy

Aircraft operations within the four runway system at LAX are primarily guided by the regulations defined in the PRUP which was adopted in 1972 by LAWA's Board of Airport Commissioners under Resolution No. 7467. The purpose of the PRUP is to reduce noise impacts from airport operations on the communities surrounding the Airport. It is LAWA's belief that without the PRUP in place, aircraft noise levels in the communities closest to the Airport would be significantly higher<sup>2</sup>. Historically, the loudest operations at the Airport are from departing aircraft. Therefore, the PRUP includes a preference for using the inboard runways, Runway 6R-24L and Runway 7L-25R, or those runways farthest from the communities directly north and south of the Airport, for departures at all times. During the more noise sensitive nighttime hours, between 10 p.m. and 7 a.m., the preferential use of the inboard runways is further expanded to include both departures and arrivals. Finally, during the late night hours between midnight and 6:30 am, a contra-flow operation, also known as the Over-Ocean Operations policy, is used to direct both arrival and departure operations over the ocean rather than over the communities east of the Airport. The Over-Ocean Policy alone provides a substantial noise benefit to the communities east of the Airport.

It is important to note that FAA Air Traffic Control (ATC) personnel have discretion to use all four runways as they deem necessary for the purposes of safety and air traffic efficiency, pursuant to federal law. It may be necessary to prescribe deviations because of aircraft emergencies, adverse weather, or field construction and maintenance work. The PRUP does not limit the discretion of either ATC or the pilot with respect to the full utilization of the airport facilities in an unusual situation. LAWA communicates with ATC personnel regularly, including LAX/Community Noise Roundtable meetings, to ensure that ATC implements the PRUP to the greatest practical extent.

LAWA engaged FedEx in 2013 at LAX/Community Noise Roundtable meetings in order to increase the use of Runway 7L-25R for departures instead of Runway 7R-25L. The purpose of this engagement was to reduce noise impacts and increase adherence to the PRUP. As a result, FedEx instituted policies whereby all FedEx pilots are to request Runway 25R for departures, with the understanding that in some instances ATC personnel may not grant the request or the inboard runway may not be available at that time, and they may be directed to depart on Runway 25L.

<sup>2</sup> LAX Preferential Runway Use Policy Report, LAWA Environmental Services Division, April 2014



Adherence with the PRUP exceeded 90 percent in 2013, with the exception of departures on the South Airfield complex in the first quarter of 2013, according to the *2014 Los Angeles International Airport Preferential Runway Use Policy Report* (2014 PRUP Report). Furthermore, adherence to the PRUP has been historically high.

## 2.2.2 Air Traffic Patterns

LAX has three standard air traffic patterns – West Flow Operations, East Flow Operations, and Over-Ocean Operations.

The West Flow Operations procedure, as depicted in *Figure 2-5*, is the normal traffic pattern used during the daytime (6:30 am to midnight) throughout the year. Aircraft approach the Airport from the east and depart the Airport to the west due to the prevailing westerly wind. This procedure routes louder departing aircraft to the west over the ocean, while arriving aircraft fly from the east to the west over the communities east of the Airport, including the cities of Los Angeles and Inglewood, and the communities of Athens and Lennox. This procedure uses Runway 24L and Runway 25R as the preferred departure runways and uses Runway 24R and Runway 25L as the preferred arrival runways.

**FIGURE 2-5:  
WEST FLOW OPERATIONS**



Source: RS&H, 2015

The East Flow Operations procedure, as depicted in *Figure 2-6*, is used when wind conditions (generally during rainstorms and Santa Ana winds) require reversing the traffic flow, so that aircraft arrive from the west and depart to the east. This routes the departing aircraft over the communities to the east, as well as areas to the north and south depending on an aircraft's destination. This procedure uses Runway 6R and Runway 7L as the preferred departure runways and uses Runway 6L and Runway 7R as the preferred arrival runways.

**FIGURE 2-6:  
EAST FLOW OPERATIONS**



Source: RS&H, 2015

During the more noise-sensitive nighttime period between midnight and 6:30 am, aircraft normally operate in accordance with the Over-Ocean Operations procedure, as depicted in *Figure 2-7*. In this procedure, aircraft depart over the ocean to the west, as in normal West Flow Operations, and arrive from the west over the ocean. This reduces the aircraft noise exposure on communities to the east of the Airport during the most noise-sensitive hours. Over-Ocean Operations may be canceled and West Flow Operations reinstated if ATC determines that conditions are unsafe for these procedures. Such conditions may include fog and low clouds at the shoreline, winds from the west, runway maintenance and repairs, FAA equipment outages, and air traffic considerations. This procedure uses Runway 25R as the preferred departures runway and Runway 6R as the preferred arrival runway.

Runway 7L-25R is involved in each of the standard air traffic patterns as a preferred departure runway.

**FIGURE 2-7:  
OVER-OCEAN OPERATIONS**

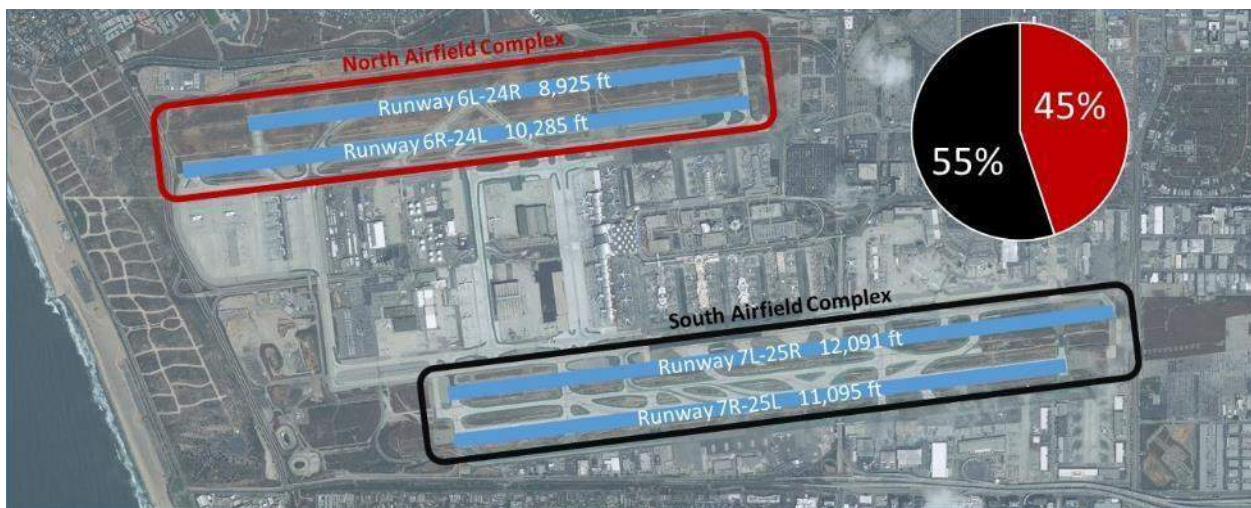


Source: RS&H, 2015

### 2.2.3 Runway Use

The South Airfield complex accommodates a larger proportional operational split than the North Airfield complex. Approximately 55 percent of all operations occurred on the South Airfield and approximately 45 percent of all operations occurred on the North Airfield in 2013, as depicted in *Figure 2-8*. The South Airfield complex is adjacent to a greater number of passenger gates, air cargo facilities, and general aviation facilities than the North Airfield complex, which contributes to the greater number of operations on the South Airfield complex.

**FIGURE 2-8:  
2013 AIRFIELD COMPLEX UTILIZATION**



Source: RS&H, 2015 and LAX Preferential Runway Use Policy Report, LAWA Environmental Services Division, April 2014

There were 609,060 total airport operations in 2013, including both departures and arrivals. The inboard runways – Runway 6R-24L and Runway 7L-25R – have a higher proportion of total airport departures due to the PRUP. Runway 7L-25R handled approximately 54 percent of total airport departures at the Airport in 2013 – more than any other runway, as depicted in *Figure 2-9*. Runway 6R-24L was the second busiest departure runway at the Airport in 2013, handling approximately 40 percent of total airport departures. The two outboard runways – Runway 6L-24R and Runway 7R-25L – are used sparingly for departures, accounting for the remaining 6 percent of total airport departures.

**FIGURE 2-9:  
2013 DEPARTURE SPLIT**



Source: RS&H, 2015 and LAX Preferential Runway Use Policy Report, LAWA Environmental Services Division, April 2014

The outboard runways – Runway 6L-24R and Runway 7R-25L – have a higher proportion of arrivals due to the PRUP. Runway 7R-25L handled 48 percent of all arrivals at the Airport in 2013 – more than any other runway, as depicted in *Figure 2-10*. Runway 6L-24R was the second busiest arrival runway at the Airport in 2013, handling 45 percent of total airport arrivals. The two inboard runways – Runway 6R-24L and Runway 7L-25R – are used sparingly for arrivals, accounting for the remaining 7 percent of total arrivals. In total, Runway 7L-25R accommodated more total operations than any other runway at the Airport in 2013.

Runway length also contributes to the frequency to which Runway 7L-25R is used for departures. Runway 7L-25R is nearly 1,000 feet longer than the second longest runway at the Airport. The long Runway 7L-25R length supports aircraft departure operations that require longer takeoff distances, especially large aircraft flying long-haul routes. Reduction in available takeoff distance may require reductions in aircraft departure payload or stage length.

**FIGURE 2-10:  
2013 ARRIVAL SPLIT**



Source: RS&H, 2015 and LAX Preferential Runway Use Policy Report, LAWA Environmental Services Division, April 2014

## 2.2.4 Airfield Challenges

Airfield constraints and runway closures are two challenges LAWA faces with the operation of Runway 7L-25R. FAA airfield design standards and aircraft sizes pose challenges for some aircraft operations on Runway 7L-25R. Group VI aircraft (e.g., Boeing 747-8 and Airbus A380) have large wingspans and require greater separation from aircraft on adjacent runways and taxiways. Nonstandard lateral separation between Runway 7L-25R and Taxiway B prohibit Group VI aircraft from using Runway 7L-25R. As a result, these aircraft are required to depart from Runway 7R-25L when assigned to the South Airfield complex. Group VI aircraft can and do depart from the North Airfield complex on Runway 24L. Adequate separation<sup>3</sup> between Runway 6R-24L and Runway 6L-24R, and between Runway 6R-24L and Taxiway E permits use by Group VI aircraft. However, Runway 6R-24L is about 1,800 feet shorter than Runway 7L-25R.

Runway closures can occur for a variety of reasons, including routine maintenance activities (e.g., rubber removal, runway painting, lighting and electrical work), pavement testing, and aircraft mechanical problems. The most common reason for runway closures, however, is routine maintenance.<sup>4</sup>

LAWA has worked to minimize closures of Runway 7L-25R as a way to reduce Runway 25L departures during more noise-sensitive periods between midnight and 6:30 a.m. In an effort to improve the existing practice of minimizing closures, LAWA consolidates all required maintenance work during planned runway closures. Several routine maintenance functions, including runway painting, concrete repair, lighting and electrical work, and rubber removal are all scheduled at the same time during the closure to minimize the frequency and the duration of the closure of the Runway. Runway 7L-25R closures are also scheduled to commence at 2:00 a.m. This is different from the other three runways where scheduled closures commence at midnight. Later Runway 7L-25R closures reduce the need for departures on the outboard runway that would otherwise

<sup>3</sup> Adequate separation achieved through use FAA approved modification to standards

<sup>4</sup> LAX Preferential Runway Use Policy Report, LAWA Environmental Services Division, April 2014

occur in the early morning hours (midnight to 2 a.m.) when there are several international carriers with scheduled departures using heavy aircraft. All of these efforts help to reduce the total closure time on Runway 7L-25R to a maximum of four hours per occurrence rather than six hours, which is typical for the three other runways.

## 2.3 EFFECTIVENESS OF ENHANCED DEPARTURE INSTRUCTIONS

An "early turn" occurs when an aircraft on a West Flow departure from any of the four LAX runways initiates a turn prior to reaching the shoreline, which results in the aircraft flying over the community to either the north or south of the Airport.

To minimize noise in residential communities along the north and south airport boundaries, aircraft departing toward the west (over the ocean) shall fly straight until they are past the shoreline before beginning any turns, unless specifically instructed otherwise by ATC. Enhanced ATC departure instructions were implemented on April 8, 2013 in an attempt to minimize early turn overflights.

For instrument departures, ATC instructs pilots to depart via specific, fixed waypoints that route aircraft across shoreline prior to turning. For visual departures, pilots are instructed to depart via runway heading and remain on LAX ATC frequency. LAX ATC instructs the pilots to contact Southern California Terminal Radar Approach Control for further instructions after the aircraft passes the shoreline. Southern California Terminal Radar Approach Control personnel do not instruct aircraft to turn on initial contact, which also helps minimize early turns.

LAWA regularly monitors all early turns and generates monthly early turn summary reports. For aircraft turning over El Segundo or the Playa del Rey / Westchester communities, LAWA uses recordings of communications between pilots and ATC to characterize the reason for the early turns as ATC directed, wind drift, assumed pilot initiated, or unknown. "Gates" are used to generally define where aircraft conduct early turns over the communities, as depicted in *Figure 2-11*. The northern gate is known as the Playa del Rey gate. The southern gate is divided into two segments - the El Segundo gate and the Hyperion gate. In general, aircraft penetrating the El Segundo or Hyperion gates are departures from Runway 25L or 25R and penetrations to the Playa del Rey gate typically depart Runway 24L or 24R.

**FIGURE 2-11:  
EARLY TURN GATES**

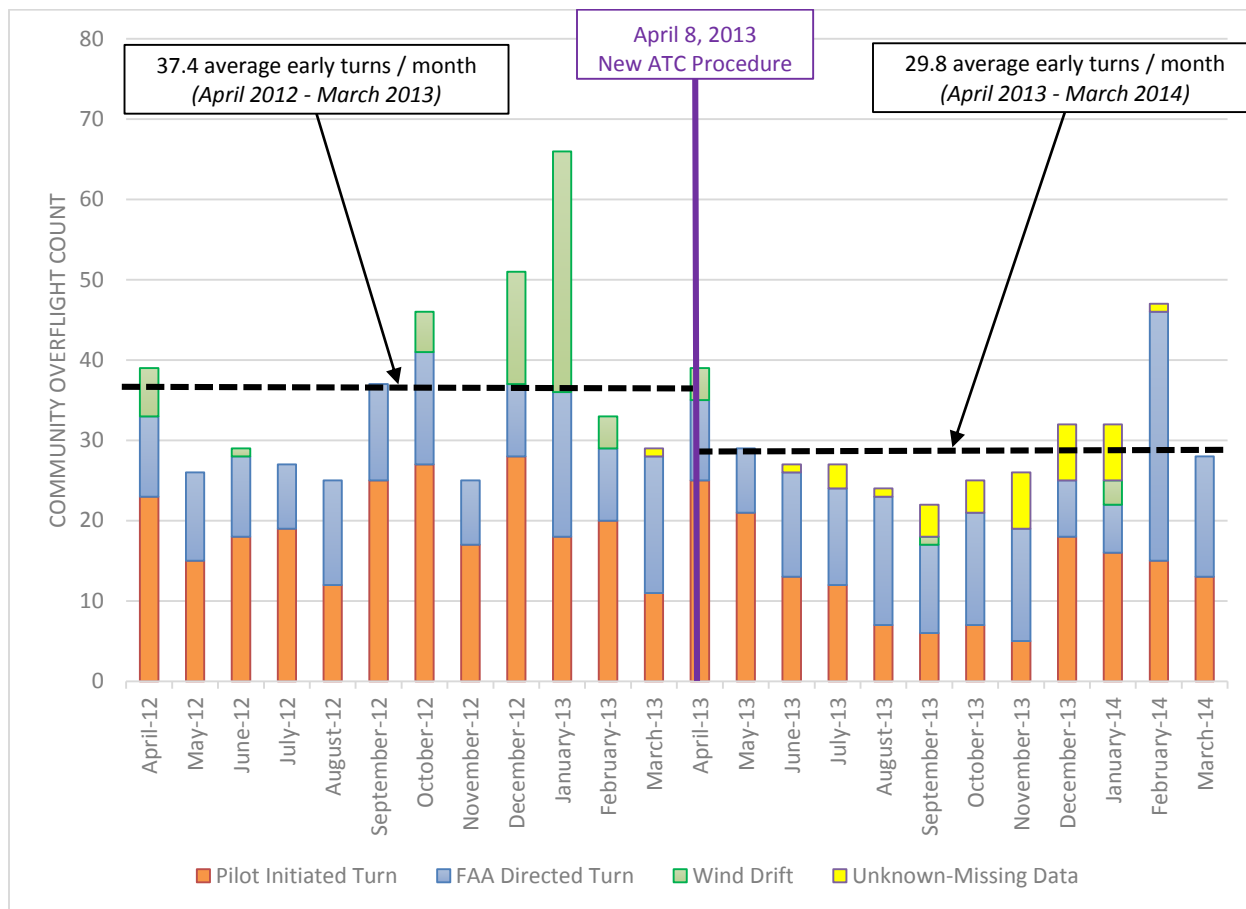


Source: Community Overflights Summaries, LAWA Noise Management Office, 2012  
- 2014

A review of the LAX early turn data was conducted for the Hyperion and El Segundo gates to summarize the impact of the newly implemented ATC departure instructions. A review of reports before and after the implementation of the enhanced ATC instructions generally demonstrates a decrease in early turn incidents, as depicted in *Figure 2-12* and *Figure 2-13*. For the El Segundo gate, there was a decrease in the average early turns per month from 37.4 to 29.8 in the 12-month period before and after April 2013, respectively. The average monthly pilot initiated early turns also decreased from 20.8 to 13.2 during the same period. This indicates an apparent effectiveness of the new ATC departure instructions. There was a slight increase in the average number of early turns that were FAA directed during the same time period but the FAA has the authority to instruct pilots to turn early to ensure the safe operation of the aircraft.

For the Hyperion gate, there was a decrease in the average early turns per month from 167.4 to 131.4 in the 12-month period before and after April 2013, respectively. The decrease in average early turns per month through the Hyperion gate also indicates effectiveness in LAWA and ATC initiatives to decrease early turns.

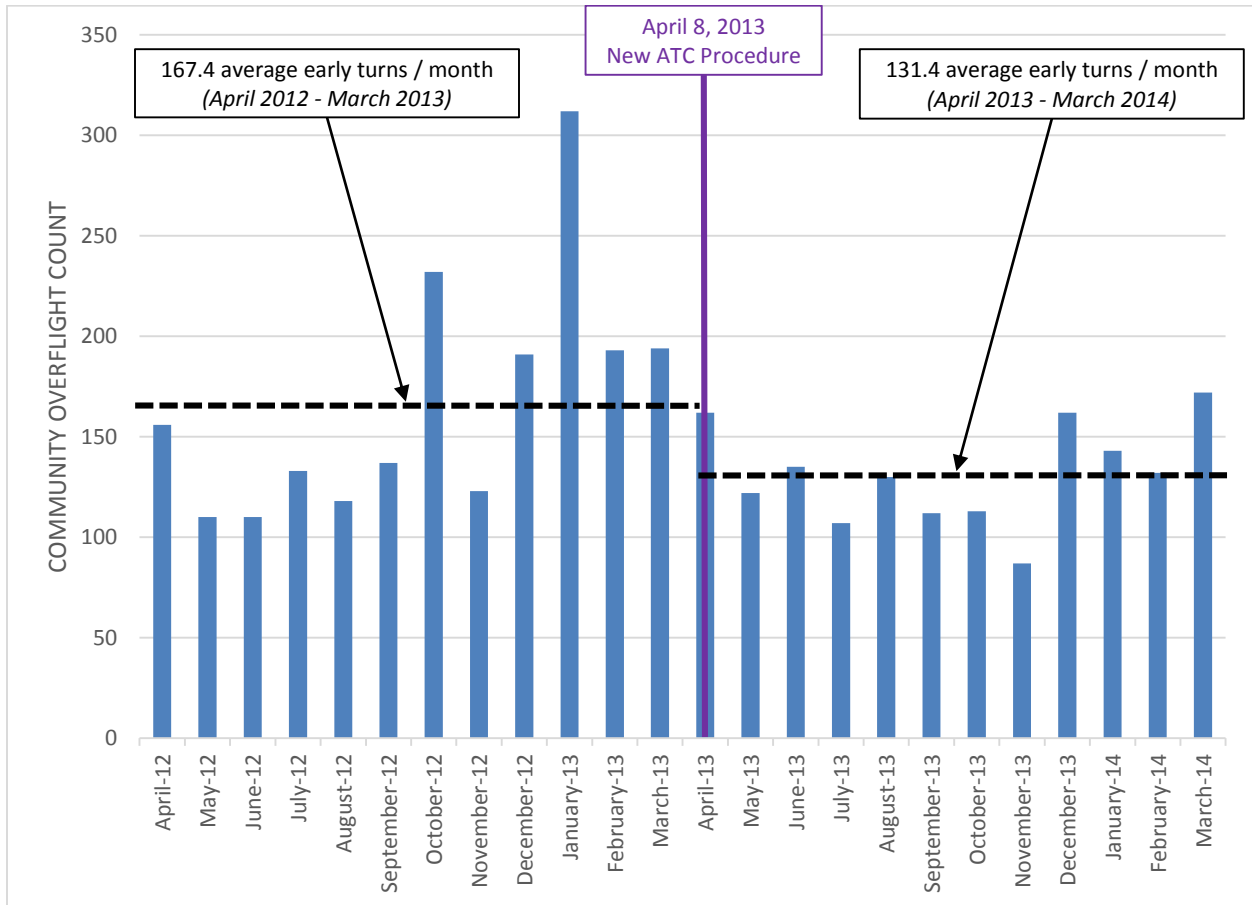
**FIGURE 2-12:  
SUMMARY OF EL SEGUNDO GATES EARLY TURNS**



Source: RS&H, 2015 and Community Overflights Summaries, LAWA Noise Management Office, 2012 - 2014



**FIGURE 2-13:  
SUMMARY OF HYPERION GATE EARLY TURNS**



Source: RS&H, 2015 and Community Overflights Summaries, LAWA Noise Management Office, 2012 - 2014

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CHAPTER 3

*IMPACT OF SHIFT*

Analyses were conducted to identify and understand the potential impacts that could be expected as a result of shifting Runway 7L-25R. These impacts are important to assess the feasibility of implementing the Shift Alternative. Potential impacts may be related to the following: obstructions, noise, Airport operations, and Very High Frequency Omnidirectional Range with Tactical Air Navigation (VORTAC) NAVAID relocation. These changes may include positive or negative impacts.

## 3.1 OBSTRUCTIONS ANALYSIS

This section describes the results of the basic obstructions analysis completed for the Approved Alternative and Shift Alternative. The obstructions analysis did not include a new field survey or new aeronautical survey. The basic obstructions analysis was completed using data from the Airport Layout Plan. The analysis evaluated four protected surfaces – Federal Aviation Regulation (FAR) Part 77 50:1 Approach Surface, Terminal Instrument Procedures (TERPS) 40:1 Departure Surface, 62.5:1 One Engine Inoperative (OEI) Surface, and 34:1 Threshold Siting Surface. The analysis evaluated how known objects impact these protected surfaces if the Shift Alternative is implemented.

There was no need to evaluate the west end of Runway 7L-25R because the west end protected surfaces do not shift. The Runway 7L threshold and endpoint remain in the same location in the Approved Alternative and the Shift Alternative. Therefore, the protected surfaces on the west end of Runway 7L-25R for the Shift Alternative do not change relative to the Approved Alternative.

The obstructions analysis focuses on the impacts on the east end of Runway 7L-25R. The Shift Alternative moves the Runway 25R endpoint 832 feet to the west relative to the Approved Alternative. Three protected surfaces on the east end of the Runway 7L-25R shift 832 feet to the west – the FAR Part 77 50:1 Approach Surface, TERPS 40:1 Departure Surface, and 62.5:1 OEI Surface. The 34:1 Threshold Siting Surface does not change because its location is based on the Runway 25R arrival threshold location, which is not relocated.

The analysis evaluated 101 objects east of Runway 7L-25R. Nearly all of the objects penetrate one or more protected surfaces in the Approved Alternative configuration. The objects penetrating the protected surfaces may no longer be penetrations as the protective surfaces move 832 feet to the west and the surface height increases relative to the object. However, additional areas are captured within the trapezoidal boundaries of the protected surfaces as the surfaces move 832 feet to the west. New penetrations are potentially introduced within these newly captured areas. Aerial survey and analysis of these areas is required to evaluate all objects within these areas and determine surface penetrations.

The objects evaluated are described in *Table 3-1*. The table includes the object number (as described on the Airport Layout Plan), the object type, the top elevation of the object, and the height of the object relative to the protected surface. A positive value indicates the object penetrates the given surface while a negative value indicates the object is below the surface. The Shift Alternative objects that were penetrations for the Approved Alternative but no longer penetrate the respective surfaces after the shift are identified in the table with red text. Green text represents new penetrations resulting from the runway shift or penetrations that remain even after the shift.

TABLE 3-1:  
OBSTRUCTIONS DATA TABLE

| Number | Object        | Top Elevation (ft.) | Approved Alternative          |          |                              |                    | Shift Alternative             |          |                              |                    |
|--------|---------------|---------------------|-------------------------------|----------|------------------------------|--------------------|-------------------------------|----------|------------------------------|--------------------|
|        |               |                     | 50:1 Part 77 Approach Surface | 34:1 TSS | 40:1 TERPS Departure Surface | 62.5:1 OEI Surface | 50:1 Part 77 Approach Surface | 34:1 TSS | 40:1 TERPS Departure Surface | 62.5:1 OEI Surface |
| 459    | Utility Pole  | 156.2               | 3.7                           | -53.9    | -16.0                        | 12.3               | -15.0                         | -53.9    | -38.9                        | -3.2               |
| 460    | Building Peak | 162.6               | 9.0                           | -49.1    | -10.9                        | 17.7               | -9.7                          | -49.1    | -33.8                        | 2.3                |
| 461    | Utility Pole  | 155.5               | 3.8                           | -53.3    | -15.6                        | 12.2               | -14.9                         | -53.3    | -38.5                        | -3.2               |
| 462    | Utility Pole  | 139.8               | 8.0                           | -39.7    | -6.4                         | 12.4               | -10.7                         | -39.7    | -29.3                        | -3.0               |
| 465    | Utility Pole  | 132.7               | 13.3                          | -28.7    | 1.9                          | 15.2               | -5.4                          | -28.7    | -21.0                        | -0.2               |
| 466    | Utility Pole  | 120.0               | 4.3                           | -35.9    | -6.2                         | 5.4                | -14.4                         | -35.9    | -29.1                        | -10.0              |
| 467    | Utility Pole  | 153.3               | 1.9                           | -55.1    | -17.4                        | 10.2               | -16.8                         | -55.1    | -40.3                        | -5.2               |
| 468    | Utility Pole  | 140.7               | 1.6                           | -49.6    | -14.7                        | 7.4                | -17.1                         | -49.6    | -37.6                        | -8.0               |
| 469    | Utility Pole  | 149.8               | 40.2                          | 3.0      | 31.4                         | N/A                | 21.5                          | 3.0      | 8.5                          | 25.0               |
| 470    | Utility Pole  | 148.7               | 36.3                          | -2.3     | 26.7                         | 36.8               | 17.6                          | -2.3     | 3.8                          | 21.4               |
| 472    | Utility Pole  | 133.5               | 1.8                           | -45.9    | -12.6                        | 6.2                | -16.9                         | -45.9    | -35.5                        | -9.2               |
| 473    | Utility Pole  | 126.7               | 3.6                           | -40.2    | -8.8                         | 6.2                | -15.1                         | -40.2    | -31.7                        | -9.2               |
| 474    | Utility Pole  | 147.8               | 31.9                          | -8.3     | 21.5                         | 33.1               | 13.2                          | -8.3     | -1.4                         | 17.7               |
| 475    | Utility Pole  | 134.2               | 13.4                          | -29.2    | 1.7                          | 15.6               | -5.3                          | -29.2    | -21.2                        | 0.2                |
| 476    | Utility Pole  | 135.5               | 16.0                          | -26.0    | 4.6                          | 17.9               | -2.7                          | -26.0    | -18.3                        | 2.5                |
| 477    | Utility Pole  | 143.5               | 16.4                          | -29.2    | 3.1                          | 19.8               | -2.3                          | -29.2    | -19.8                        | 4.4                |
| 479    | Utility Pole  | 141.8               | 11.0                          | -36.3    | -3.2                         | 15.2               | -7.7                          | -36.3    | -26.1                        | -0.2               |
| 480    | Utility Pole  | 152.3               | N/A                           | N/A      | 40.8                         | N/A                | 29.9                          | N/A      | 17.9                         | 32.0               |
| 481    | Utility Pole  | 134.3               | 13.5                          | -29.2    | 1.7                          | 15.6               | -5.2                          | -29.2    | -21.2                        | 0.2                |
| 482    | Building Peak | 121.2               | 10.6                          | -27.2    | 1.4                          | 10.7               | -8.1                          | -27.2    | -21.5                        | -4.7               |
| 483    | Utility Pole  | 129.2               | 4.6                           | -39.8    | -8.1                         | 7.5                | -14.1                         | -39.8    | -31.0                        | -7.9               |
| 484    | Utility Pole  | 131.5               | 24.8                          | -11.2    | 16.6                         | N/A                | 6.1                           | -11.2    | -6.3                         | 9.0                |
| 485    | Building Peak | 118.1               | 3.3                           | -36.4    | -6.9                         | 4.3                | -15.4                         | -36.4    | -29.8                        | -11.1              |
| 486    | Light Pole    | 127.5               | 18.8                          | -18.1    | 10.1                         | N/A                | 0.1                           | -18.1    | -12.8                        | 3.4                |
| 487    | Building Peak | 118.8               | 2.5                           | -38.0    | -8.1                         | 3.8                | -16.2                         | -38.0    | -31.0                        | -11.6              |
| 488    | Building Peak | 119.8               | 1.2                           | -40.4    | -10.0                        | 2.9                | -17.5                         | -40.4    | -32.9                        | -12.5              |
| 489    | Utility Pole  | 124.4               | 3.9                           | -38.6    | -7.8                         | 6.0                | -14.8                         | -38.6    | -30.7                        | -9.4               |

| Number | Object        | Top Elevation (ft.) | Approved Alternative          |          |                              |                    | Shift Alternative             |          |                              |                    |
|--------|---------------|---------------------|-------------------------------|----------|------------------------------|--------------------|-------------------------------|----------|------------------------------|--------------------|
|        |               |                     | 50:1 Part 77 Approach Surface | 34:1 TSS | 40:1 TERPS Departure Surface | 62.5:1 OEI Surface | 50:1 Part 77 Approach Surface | 34:1 TSS | 40:1 TERPS Departure Surface | 62.5:1 OEI Surface |
| 490    | Fence         | 103.3               | 2.9                           | -30.1    | -3.7                         | N/A                | -15.8                         | -30.1    | -26.6                        | -14.2              |
| 491    | Building Peak | 114.3               | 12.7                          | -20.9    | 5.8                          | N/A                | -6.0                          | -20.9    | -17.1                        | -4.1               |
| 492    | Light Pole    | 113.0               | 10.2                          | -23.9    | 3.0                          | N/A                | -8.5                          | -23.9    | -19.9                        | -6.4               |
| 493    | Building Peak | 122.5               | 17.0                          | -18.3    | 9.2                          | 16.1               | -1.7                          | -18.3    | -13.7                        | 0.7                |
| 494    | Light Pole    | 127.1               | 18.7                          | -18.1    | 10.0                         | 18.4               | 0.0                           | -18.1    | -12.9                        | 3.0                |
| 495    | Utility Pole  | 137.1               | 5.4                           | -42.4    | -9.1                         | 9.7                | -13.3                         | -42.4    | -32.0                        | -5.7               |
| 496    | Building Peak | 104.9               | 4.5                           | -28.5    | -2.1                         | N/A                | -14.2                         | -28.5    | -25.0                        | -12.6              |
| 498    | Building Peak | 109.6               | 8.8                           | -24.4    | 2.1                          | N/A                | -9.9                          | -24.4    | -20.8                        | -8.2               |
| 499    | Fence         | 102.9               | N/A                           | -34.1    | -7.2                         | N/A                | -18.4                         | -34.1    | -30.1                        | -16.5              |
| 500    | Ground        | 103.2               | 2.1                           | -31.2    | -4.7                         | N/A                | -16.6                         | -31.2    | -27.6                        | N/A                |
| 501    | Utility Pole  | 128.4               | 4.2                           | -40.1    | -8.4                         | 7.0                | -14.5                         | -40.1    | -31.3                        | -8.4               |
| 503    | Building Peak | 109.8               | 7.7                           | -26.1    | 0.7                          | N/A                | -11.0                         | -26.1    | -22.2                        | -9.0               |
| 504    | Building Peak | 103.7               | 1.1                           | -32.9    | -6.0                         | N/A                | -17.6                         | -32.9    | -28.9                        | -15.5              |
| 505    | Light Pole    | 102.5               | 1.1                           | -32.3    | -5.7                         | N/A                | -17.6                         | -32.3    | -28.6                        | -15.7              |
| 506    | Light Pole    | 112.5               | 11.9                          | -21.2    | 5.2                          | N/A                | -6.8                          | -21.2    | -17.7                        | -5.1               |
| 507    | Ground        | 103.2               | 2.3                           | -30.9    | -4.4                         | N/A                | -16.4                         | -30.9    | -27.3                        | -14.6              |
| 508    | Fence         | 103.2               | 2.1                           | -31.2    | -4.6                         | N/A                | -16.6                         | -31.2    | -27.5                        | -14.8              |
| 509    | Building Peak | 114.7               | 0.2                           | -39.5    | -10.0                        | 1.1                | -18.5                         | -39.5    | -32.9                        | -14.3              |
| 510    | Treetop       | 105.5               | 8.2                           | -23.3    | 2.4                          | N/A                | -10.5                         | -23.3    | -20.5                        | -9.5               |
| 511    | Building Peak | 107.1               | 5.7                           | -27.8    | -1.2                         | N/A                | -13.0                         | -27.8    | -24.1                        | -11.2              |
| 512    | Light Pole    | 102.6               | 0.1                           | -33.9    | -7.1                         | N/A                | -18.6                         | -33.9    | -30.0                        | -16.5              |
| 513    | Sign          | 121.4               | 17.3                          | -17.5    | 9.7                          | 16.1               | -1.4                          | -17.5    | -13.2                        | 0.7                |
| 514    | Sign          | 125.7               | 25.6                          | -7.3     | 19.1                         | N/A                | 6.9                           | -7.3     | -3.8                         | 8.5                |
| 515    | Treetop       | 106.3               | 9.1                           | -22.4    | 3.3                          | N/A                | -9.6                          | -22.4    | -19.6                        | -8.6               |
| 516    | Utility Pole  | 122.5               | 2.2                           | -40.2    | -9.4                         | 4.2                | -16.5                         | -40.2    | -32.3                        | -11.2              |
| 517    | Light Pole    | 102.9               | 0.4                           | -33.5    | -6.7                         | -1.1               | -18.3                         | -33.5    | -29.6                        | -16.5              |
| 518    | Sign          | 125.1               | 24.8                          | -8.2     | 18.2                         | N/A                | 6.1                           | -8.2     | -4.7                         | 7.7                |
| 519    | Sign          | 100.6               | 2.3                           | -29.8    | -3.9                         | N/A                | -16.4                         | -29.8    | -26.8                        | -15.2              |

| Number | Object        | Top Elevation (ft.) | Approved Alternative          |          |                              |                    | Shift Alternative             |          |                              |                    |
|--------|---------------|---------------------|-------------------------------|----------|------------------------------|--------------------|-------------------------------|----------|------------------------------|--------------------|
|        |               |                     | 50:1 Part 77 Approach Surface | 34:1 TSS | 40:1 TERPS Departure Surface | 62.5:1 OEI Surface | 50:1 Part 77 Approach Surface | 34:1 TSS | 40:1 TERPS Departure Surface | 62.5:1 OEI Surface |
| 520    | Fence         | 102.9               | 0.4                           | -33.6    | -6.7                         | -1.1               | -18.3                         | -33.6    | -29.6                        | -16.5              |
| 521    | Fence         | 103.1               | 2.4                           | -30.8    | -4.4                         | N/A                | -16.3                         | -30.8    | -27.3                        | -14.7              |
| 522    | Utility Pole  | 147.4               | -3.6                          | -60.1    | -22.6                        | 4.8                | -22.3                         | -60.1    | -45.5                        | -10.6              |
| 523    | Treetop       | 103.8               | 6.6                           | -24.9    | 0.8                          | N/A                | -12.1                         | -24.9    | -22.1                        | -11.1              |
| 524    | Sign          | 104.4               | 4.5                           | -28.2    | -1.9                         | N/A                | -14.2                         | -28.2    | -24.8                        | -12.6              |
| 526    | Road          | 108.2               | 9.1                           | -23.2    | 2.9                          | N/A                | -9.6                          | -23.2    | -20.0                        | -8.2               |
| 527    | Tower         | 117.9               | N/A                           | -6.0     | 19.0                         | N/A                | 5.5                           | -6.0     | -3.9                         | 5.6                |
| 529    | Utility Pole  | 127.9               | 7.7                           | -34.7    | -3.9                         | 9.7                | -11.0                         | -34.7    | -26.8                        | -5.7               |
| 531    | Fence         | 102.2               | 7.5                           | -22.8    | 2.3                          | N/A                | -11.2                         | -22.8    | -20.6                        | -10.7              |
| 534    | Road          | 108.6               | N/A                           | -14.8    | 10.1                         | N/A                | -3.5                          | -14.8    | -12.8                        | -3.4               |
| 536    | Railroad      | 116.2               | 18.5                          | -13.3    | 12.6                         | N/A                | -0.2                          | -13.3    | -10.3                        | 0.9                |
| 537    | Fence         | 98.5                | 0.4                           | -31.6    | -5.7                         | N/A                | -18.3                         | -31.6    | -28.6                        | -17.2              |
| 538    | Road          | 108.6               | 14.6                          | -15.4    | 9.6                          | N/A                | -4.1                          | -15.4    | -13.3                        | -3.8               |
| 539    | Sign          | 104.5               | 4.9                           | -27.8    | -1.6                         | 2.8                | -13.8                         | -27.8    | -24.5                        | -12.6              |
| 540    | Fence         | 101.9               | 4.8                           | -26.6    | -0.9                         | N/A                | -13.9                         | -26.6    | -23.8                        | -12.9              |
| 541    | Building Peak | 101.1               | 4.5                           | -26.8    | -1.2                         | N/A                | -14.2                         | -26.8    | -24.1                        | -13.4              |
| 542    | Sign          | 101.3               | 3.2                           | -28.8    | -2.9                         | N/A                | -15.5                         | -28.8    | -25.8                        | -14.4              |
| 545    | Building Peak | 101.4               | 4.9                           | -26.3    | -0.8                         | N/A                | -13.8                         | -26.3    | -23.7                        | -12.9              |
| 548    | Building Peak | 101.9               | 5.3                           | -25.9    | -0.4                         | N/A                | -13.4                         | -25.9    | -23.3                        | -12.5              |
| 560    | Light Pole    | 118.3               | 17.3                          | -16.0    | 10.5                         | 15.5               | -1.4                          | -16.0    | -12.4                        | 0.1                |
| 590    | Fence         | 100.0               | 5.9                           | -24.1    | 0.9                          | 2.8                | -12.8                         | -24.1    | -22.0                        | -12.6              |
| 593    | Sign          | 101.7               | 4.2                           | -27.4    | -1.7                         | 1.7                | -14.5                         | -27.4    | -24.6                        | -13.7              |
| 597    | Utility Pole  | 107.5               | 10.3                          | -21.2    | 4.5                          | 7.8                | -8.4                          | -21.2    | -18.4                        | -7.6               |
| 598    | Sign          | 99.2                | 2.7                           | -28.4    | -2.9                         | N/A                | -16.0                         | -28.4    | -25.8                        | N/A                |
| 614    | Runway Light  | 120.5               | 10.5                          | -27.0    | 1.5                          | 10.5               | -8.2                          | -27.0    | -21.4                        | -4.9               |
| 615    | Utility Pole  | 150.3               | 0.7                           | -55.5    | -18.2                        | 8.6                | -18.0                         | -55.5    | -41.1                        | -6.8               |
| 622    | Fence         | 98.9                | 0.2                           | -32.1    | -0.6                         | -2.1               | -18.5                         | -32.1    | -23.5                        | -17.5              |
| 628    | Fence         | 107.0               | N/A                           | -16.0    | 8.8                          | 10.3               | -4.8                          | -16.0    | -14.1                        | -5.1               |

| Number | Object       | Top Elevation (ft.) | Approved Alternative          |          |                              |                    | Shift Alternative             |          |                              |                    |
|--------|--------------|---------------------|-------------------------------|----------|------------------------------|--------------------|-------------------------------|----------|------------------------------|--------------------|
|        |              |                     | 50:1 Part 77 Approach Surface | 34:1 TSS | 40:1 TERPS Departure Surface | 62.5:1 OEI Surface | 50:1 Part 77 Approach Surface | 34:1 TSS | 40:1 TERPS Departure Surface | 62.5:1 OEI Surface |
| 629    | Fence        | 95.6                | 1.3                           | -28.8    | -3.8                         | -1.8               | -17.4                         | -28.8    | -26.7                        | -17.2              |
| 637    | Road         | 107.2               | 12.2                          | -18.2    | 7.0                          | 9.2                | -6.5                          | -18.2    | -15.9                        | -6.2               |
| 644    | Utility Pole | 149.4               | 0.1                           | -55.9    | -18.7                        | 8.0                | -18.6                         | -55.9    | -41.6                        | -7.4               |
| 661    | Tower        | 108.1               | 0.7                           | -35.6    | -7.6                         | 0.2                | -18.0                         | -35.6    | -30.5                        | -15.2              |
| 663    | Utility Pole | 181.2               | 7.3                           | -60.3    | -17.7                        | 20.1               | -11.4                         | -60.3    | -40.6                        | 4.7                |
| 667    | Fence        | 97.3                | 0.8                           | -30.3    | -4.8                         | -1.9               | -17.9                         | -30.3    | -27.7                        | -17.3              |
| 677    | Sign         | 101.9               | 4.1                           | -27.7    | -1.9                         | 1.7                | -14.6                         | -27.7    | -24.8                        | -13.7              |
| 678    | Fence        | 100.0               | 4.8                           | -25.8    | -0.5                         | 1.8                | -13.9                         | -25.8    | -23.4                        | -13.6              |
| 680    | Railroad     | 117.0               | 21.3                          | -9.6     | 15.8                         | 18.4               | 2.6                           | -9.6     | -7.1                         | 3.0                |
| 681    | Road         | 106.8               | 10.4                          | -20.8    | 4.8                          | 7.7                | -8.3                          | -20.8    | -18.1                        | -7.7               |
| 683    | Road         | 107.0               | 12.8                          | -17.2    | 7.8                          | N/A                | -5.9                          | -17.2    | -15.1                        | -5.5               |
| 685    | Fence        | 98.3                | 0.5                           | -31.3    | -5.5                         | N/A                | -18.2                         | -31.3    | -28.4                        | -17.1              |
| 691    | Road         | 107.8               | 10.9                          | -20.5    | 5.1                          | N/A                | -7.8                          | -20.5    | -17.8                        | -6.9               |
| 696    | Fence        | 99.7                | 4.7                           | -25.8    | -0.6                         | N/A                | -14.0                         | -25.8    | -23.5                        | -13.4              |
| 700    | Fence        | 98.5                | 0.9                           | -30.7    | -5.0                         | N/A                | -17.8                         | -30.7    | -27.9                        | -16.7              |
| 701    | Railroad     | 117.0               | 21.5                          | -9.1     | 16.2                         | N/A                | 2.8                           | -9.1     | -6.7                         | 3.5                |
| 703    | Fence        | 97.3                | 1.4                           | -29.6    | -4.2                         | N/A                | -17.3                         | -29.6    | -27.1                        | -16.6              |
| 724    | Utility Pole | 203.6               | N/A                           | N/A      | -10.5                        | 32.8               | -0.9                          | N/A      | -33.4                        | 17.4               |

Source: RS&H, 2015 and Draft LAX Airport Layout Plan, 2012



## 3.1.1 FAR Part 77 50:1 Approach Surface

The FAR Part 77 50:1 Approach Surface, as depicted in *Figure 3-1*, starts 200 feet from the runway end and extends 10,000 feet at a 50:1 slope with an additional 40,000 feet at a 40:1 slope. This protected surface is used to assess whether an object may present a potential hazard to air navigation though not all penetrations are considered hazards to air navigation. There are 94 penetrations to the FAR Part 77 50:1 Approach Surface in the Approved Alternative. The greatest penetration to the Surface is approximately 40 feet in the Approved Alternative configuration. Implementing the Shift Alternative reduces the number of known penetrations from 94 to nine.

Implementing the Shift Alternative results in 284 acres of newly captured area within the boundary of the FAR Part 77 50:1 Approach Surface. Based on available information, two new objects located within the newly captured areas would penetrate the Surface. In total, at least 11 penetrations exist for the FAR Part 77 50:1 Approach Surface in the Shift Alternative configuration. The greatest known penetration to the Surface is approximately 22 feet in the Shift Alternative configuration. The newly captured area requires further analysis, including a new aerial survey and obstructions analysis, to determine if additional objects would penetrate the relocated Approach Surface.

## 3.1.2 TERPS 40:1 Departure Surface

The TERPS 40:1 Departure Surface, as depicted in *Figure 3-2*, starts at the end of the runway and extends 10,200 feet at a 40:1 slope. This Surface should be clear of obstacles to protect aircraft departing in Instrument Meteorological Conditions. Although this area is not as shallow of the Part 77 50:1 surface, it covers a greater swath of land closer to the airport.

There are 42 penetrations to the TERPS 40:1 Departure Surface in the Approved Alternative. The greatest penetration to the Surface is approximately 41 feet in the Approved Alternative configuration. Implementing the Shift Alternative reduces the number of known penetrations from 42 to three. The greatest known penetration to the Surface is approximately 18 feet in the Shift Alternative configuration.

Implementing the Shift Alternative results in 100 acres of newly captured area within the boundary of the TERPS 40:1 Departure Surface. The newly captured area requires further analysis, including a new aerial survey and obstructions analysis, to determine if additional objects would penetrate the relocated Departure Surface.

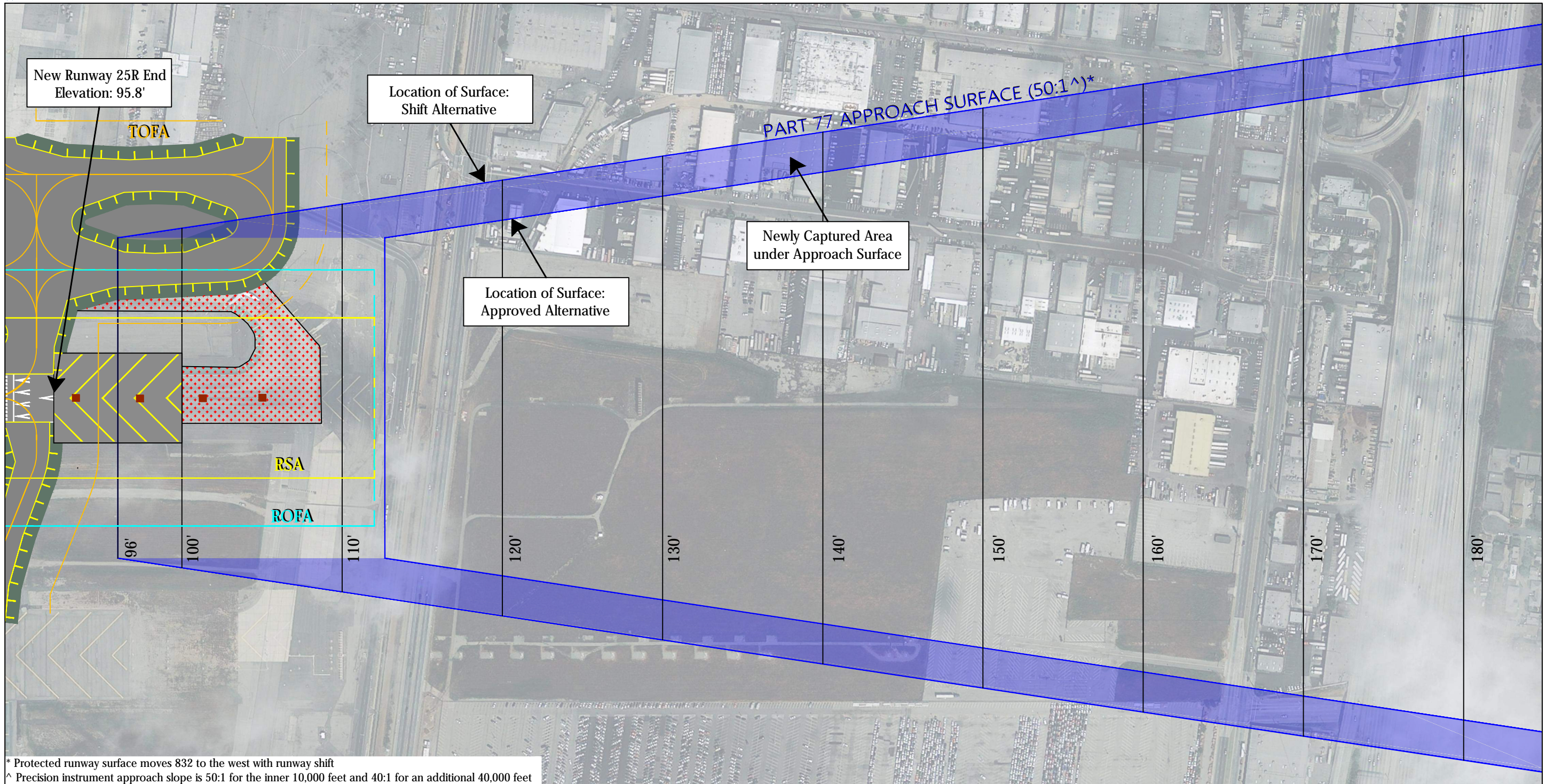
## 3.1.3 62.5:1 One Engine Inoperative (OEI) Surface

The 62.5:1 OEI Surface, as depicted in *Figure 3-3*, begins at the runway end and extends for 50,000 feet at a 62.5:1 slope. This Surface should be clear of obstacles to protect departing aircraft that experience an engine failure. There are 49 penetrations to the 62.5:1 OEI Surface in the Approved Alternative. The greatest penetration to the Surface is approximately 37 feet in the Approved Alternative configuration. Implementing the Shift Alternative reduces the number of known penetrations from 49 to 14.

Implementing the Shift Alternative results in 219 acres of newly captured area within the boundary of the 62.5:1 OEI Surface. Based on available information, nine new objects located within the newly captured area penetrate the Surface. In total, at least 23 penetrations exist for the 62.5:1 OEI Surface in the Shift Alternative configuration. The greatest known penetration to the Surface is approximately 32 feet in the Shift Alternative configuration. The newly captured area requires further analysis, including a new aerial survey and obstructions analysis, to determine if additional objects would penetrate the relocated OEI Surface.

### 3.1.4 34:1 Threshold Siting Surface

The 34:1 Threshold Siting Surface, as depicted in *Figure 3-4*, is located 200 feet from the Runway 25R threshold. This Surface should be clear of obstacles and used to establish the location of the threshold. The Surface extends 10,000 feet at a slope of 34:1. This slope is steeper when compared with the other protected surfaces. There is one penetration to the 34:1 Threshold Siting Surface in the Approved Alternative. The object penetrates the Surface by approximately 3 feet in the Approved Alternative configuration. The 34:1 Threshold Siting Surface does not change if the Shift Alternative is implemented. The penetration remains and no new area would be captured.



**Legend**

- Runway Safety Area (RSA)
- Runway Object Free Area (ROFA)
- - Taxiway Object Free Area (TOFA)
- Navigational Aids (NAVAIDS)
- Part 77 Approach Surface
- ▤ Pavement to be Removed

**Declared Distances**

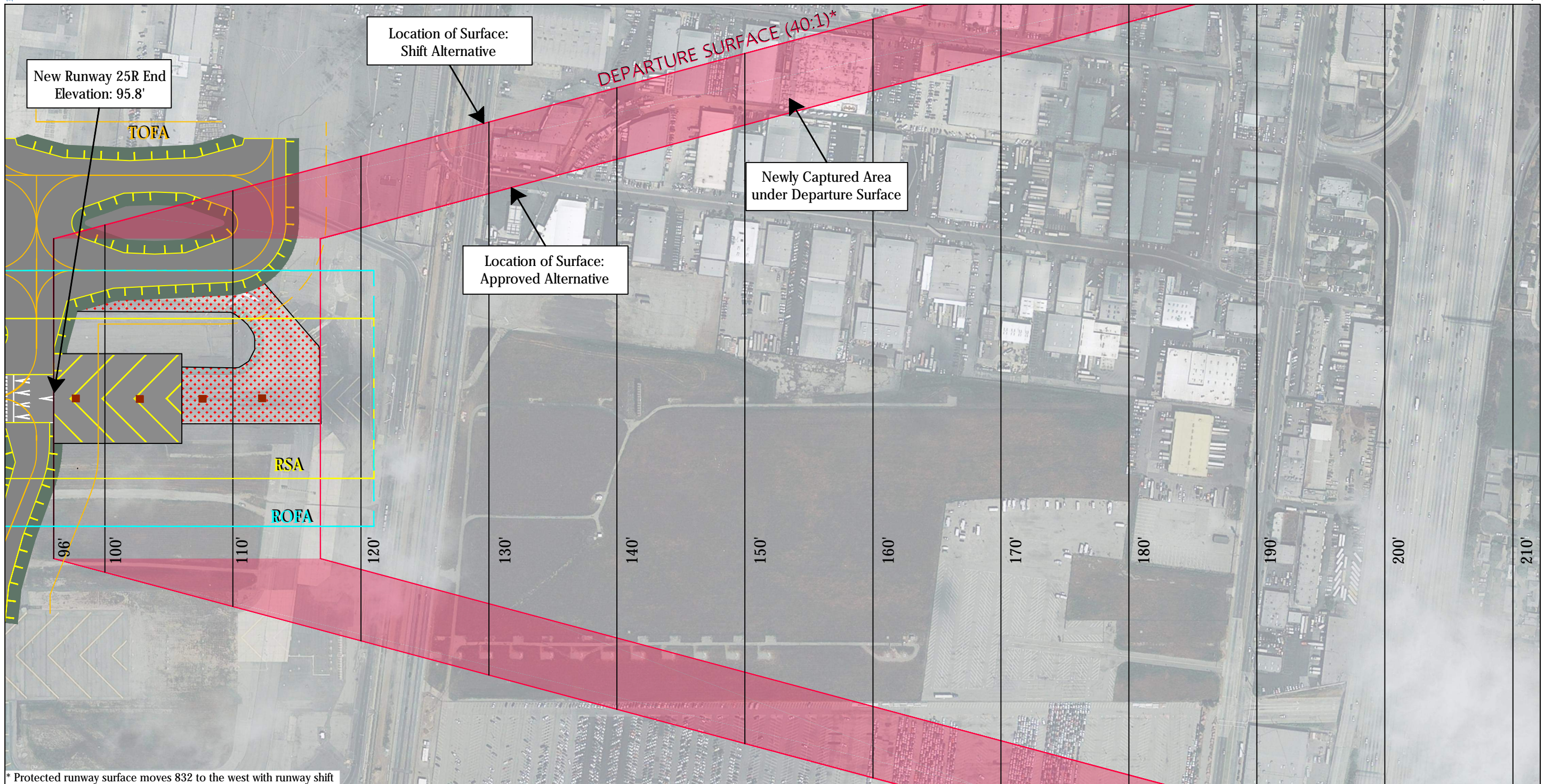
| Operational Direction | TORA    | TODA    | LDA     | ASDA    |
|-----------------------|---------|---------|---------|---------|
| West Flow Rwy 25R     | 12,091' | 12,091' | 11,966' | 12,091' |
| East Flow Rwy 7L      | 12,091' | 12,091' | 11,259' | 12,091' |

TORA - Takeoff Run Available  
ASDA - Accelerate Stop Distance Available  
TODA - Takeoff Distance Available  
LDA - Landing Distance Available

**Figure 3-1:**  
Shift Alternative Runway 25R (East) Part 77 Approach Surface



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**Legend**

- Runway Safety Area (RSA)
- Runway Object Free Area (ROFA)
- - - Taxiway Object Free Area (TOFA)
- Navigational Aids (NAVAIDS)
- Departure Surface
- Pavement to be Removed

**Declared Distances**

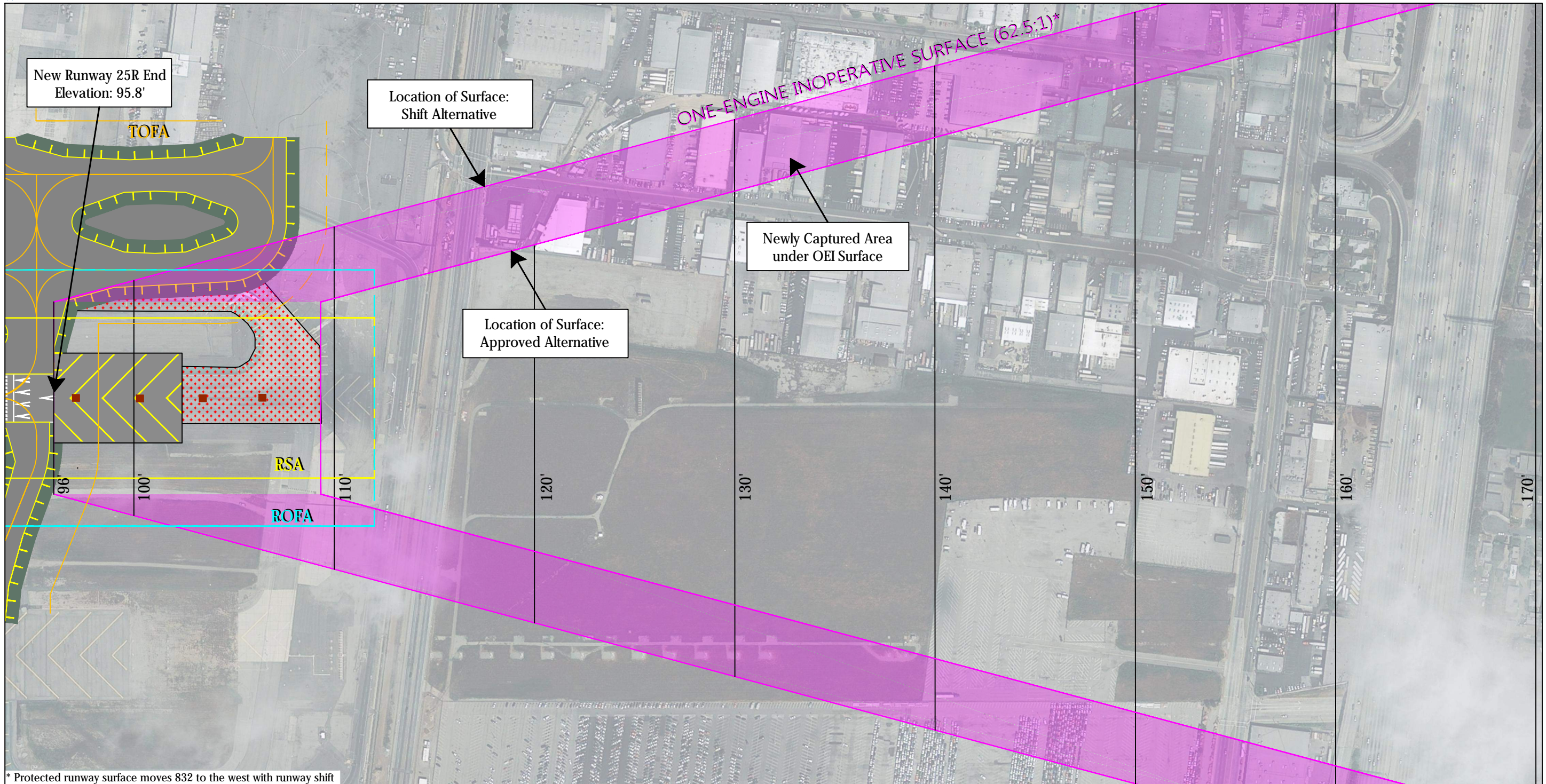
| Operational Direction | TORA    | TODA    | LDA     | ASDA    |
|-----------------------|---------|---------|---------|---------|
| West Flow Rwy 25R     | 12,091' | 12,091' | 11,966' | 12,091' |
| East Flow Rwy 7L      | 12,091' | 12,091' | 11,259' | 12,091' |

TORA - Takeoff Run Available  
ASDA - Accelerate Stop Distance Available  
TODA - Takeoff Distance Available  
LDA - Landing Distance Available

**Figure 3-2:**  
Shift Alternative Runway 25R (East) Departure Surface



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**Legend**

- Runway Safety Area (RSA)
- Runway Object Free Area (ROFA)
- Taxiway Object Free Area (TOFA)
- Navigational Aids (NAVAIDS)
- One-Engine Inoperative (OEI) Surface
- Pavement to be Removed

**Declared Distances**

| Operational Direction | TORA    | TODA    | LDA     | ASDA    |
|-----------------------|---------|---------|---------|---------|
| West Flow Rwy 25R     | 12,091' | 12,091' | 11,966' | 12,091' |
| East Flow Rwy 7L      | 12,091' | 12,091' | 11,259' | 12,091' |

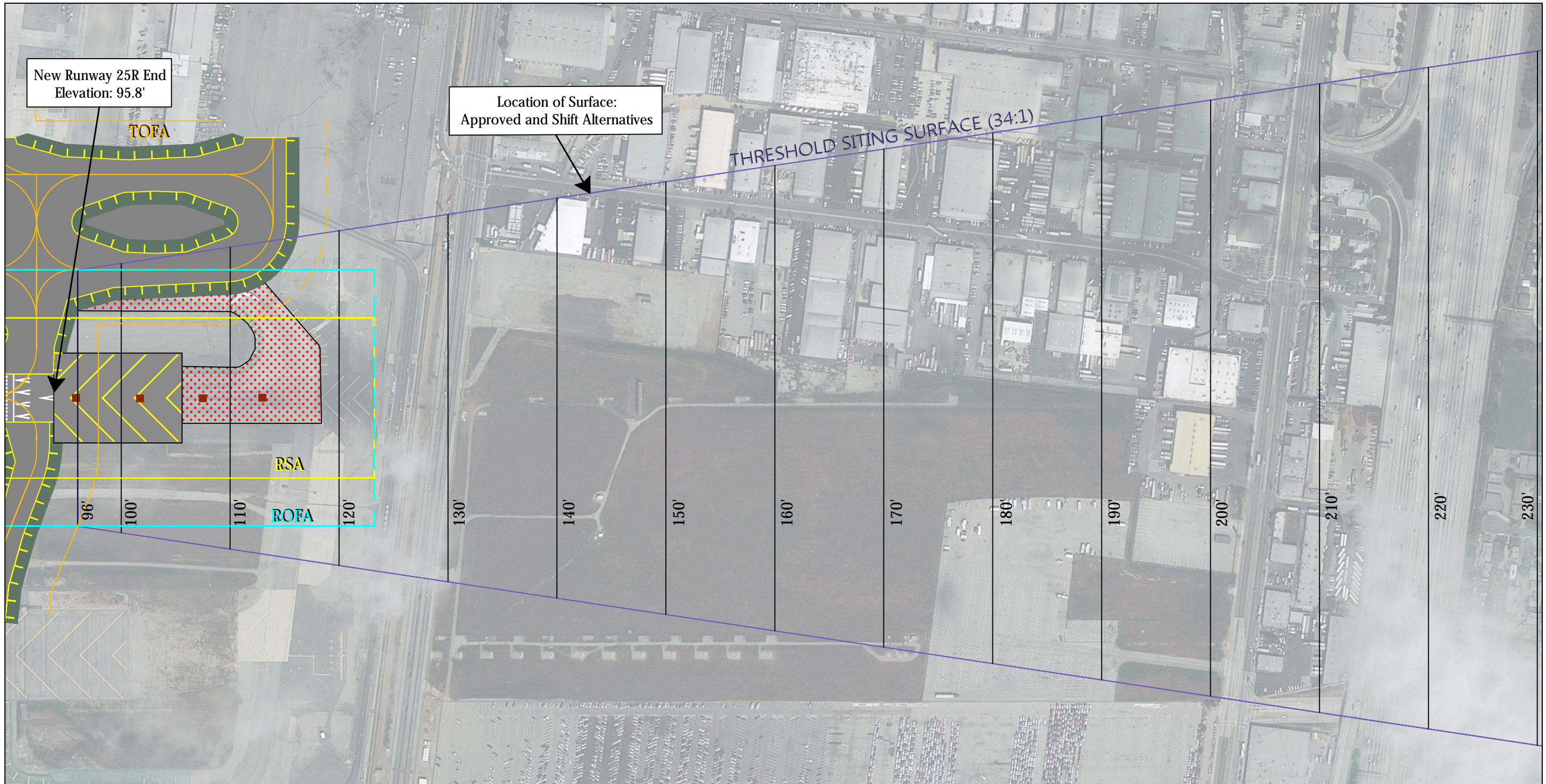
TORA - Takeoff Run Available  
ASDA - Accelerate Stop Distance Available  
TODA - Takeoff Distance Available  
LDA - Landing Distance Available

**Figure 3-3:**  
Shift Alternative Runway 25R (East) One-Engine Inoperative Surface



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**Legend**

- Runway Safety Area (RSA)
- Runway Object Free Area (ROFA)
- - - Taxiway Object Free Area (TOFA)
- Navigational Aids (NAVAIDS)
- Threshold Siting Surface
- Pavement to be Removed

**Declared Distances**

| Operational Direction | TORA    | TODA    | LDA     | ASDA    |
|-----------------------|---------|---------|---------|---------|
| West Flow Rwy 25R     | 12,091' | 12,091' | 11,966' | 12,091' |
| East Flow Rwy 7L      | 12,091' | 12,091' | 11,259' | 12,091' |

TORA - Takeoff Run Available  
ASDA - Accelerate Stop Distance Available  
TODA - Takeoff Distance Available  
LDA - Landing Distance Available

**Figure 3-4:**  
Shift Alternative Runway 25R (East) Threshold Siting Surface



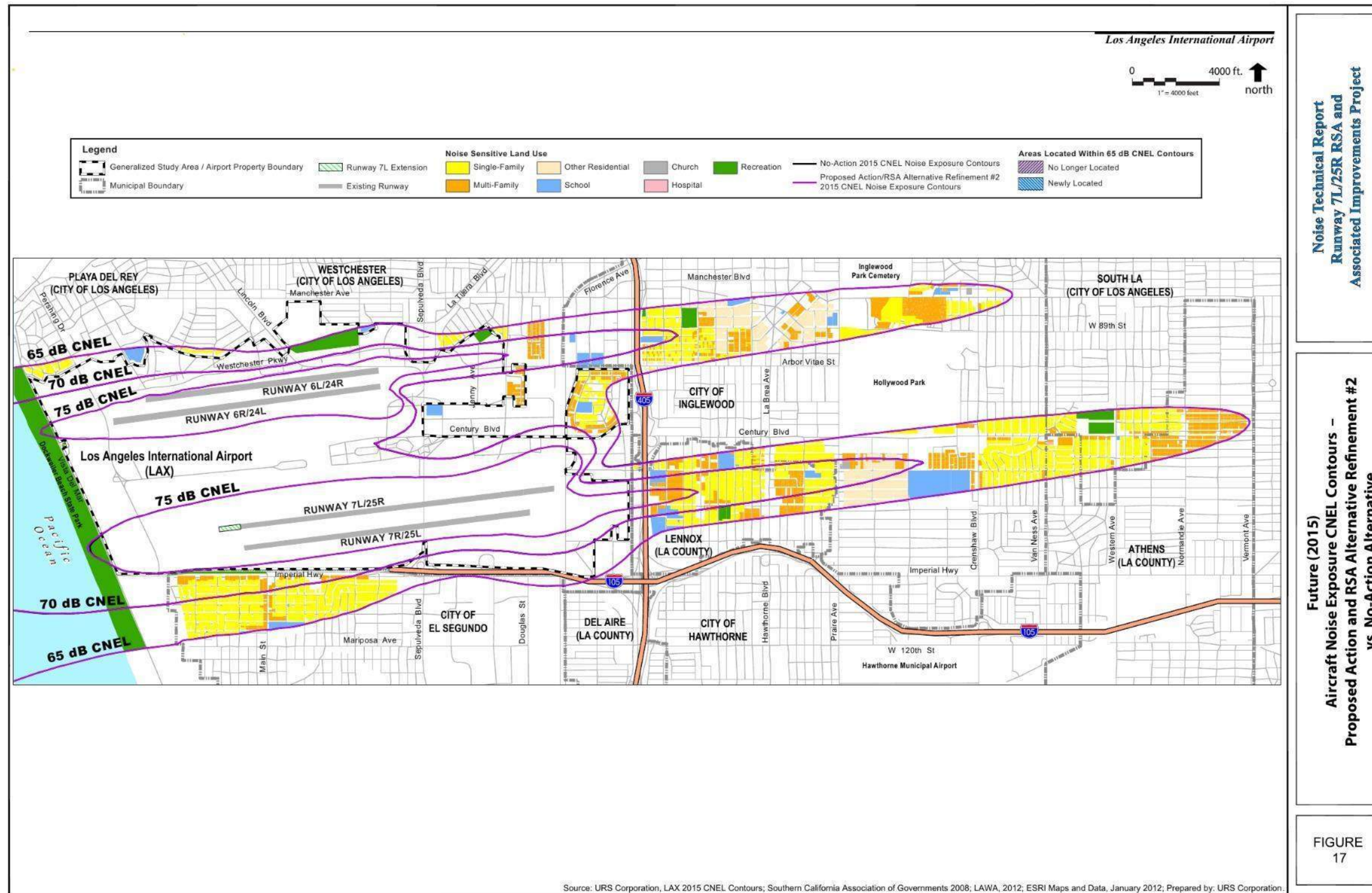
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## 3.2 NOISE IMPACTS

Noise impact studies were completed as part of the Runway 7L-25R environmental analyses. Alternatives evaluated within the NEPA and CEQA environmental analyses, include the No-Action Alternative, Proposed Action Alternative, and the Shift Runway Alternative. The Proposed Action Alternative in the 2013 Final EA corresponds to the Approved Alternative that will be implemented within the next few years. The noise impacts associated with the Approved Alternative (Proposed Action Alternative) and the Shift Alternative were evaluated in comparison to the No-Action Alternative in the 2013 Final EA. *Figure 3-5* and *Figure 3-6* depict the noise contour comparisons between the Approved Alternative and No-Action Alternative. *Figure 3-7* and *Figure 3-8* depict the noise contour comparisons between the Shift Alternative and No-Action Alternative. Detailed description of the noise impacts can be found in Section 4.2 and Appendix B of the 2013 Final EA.

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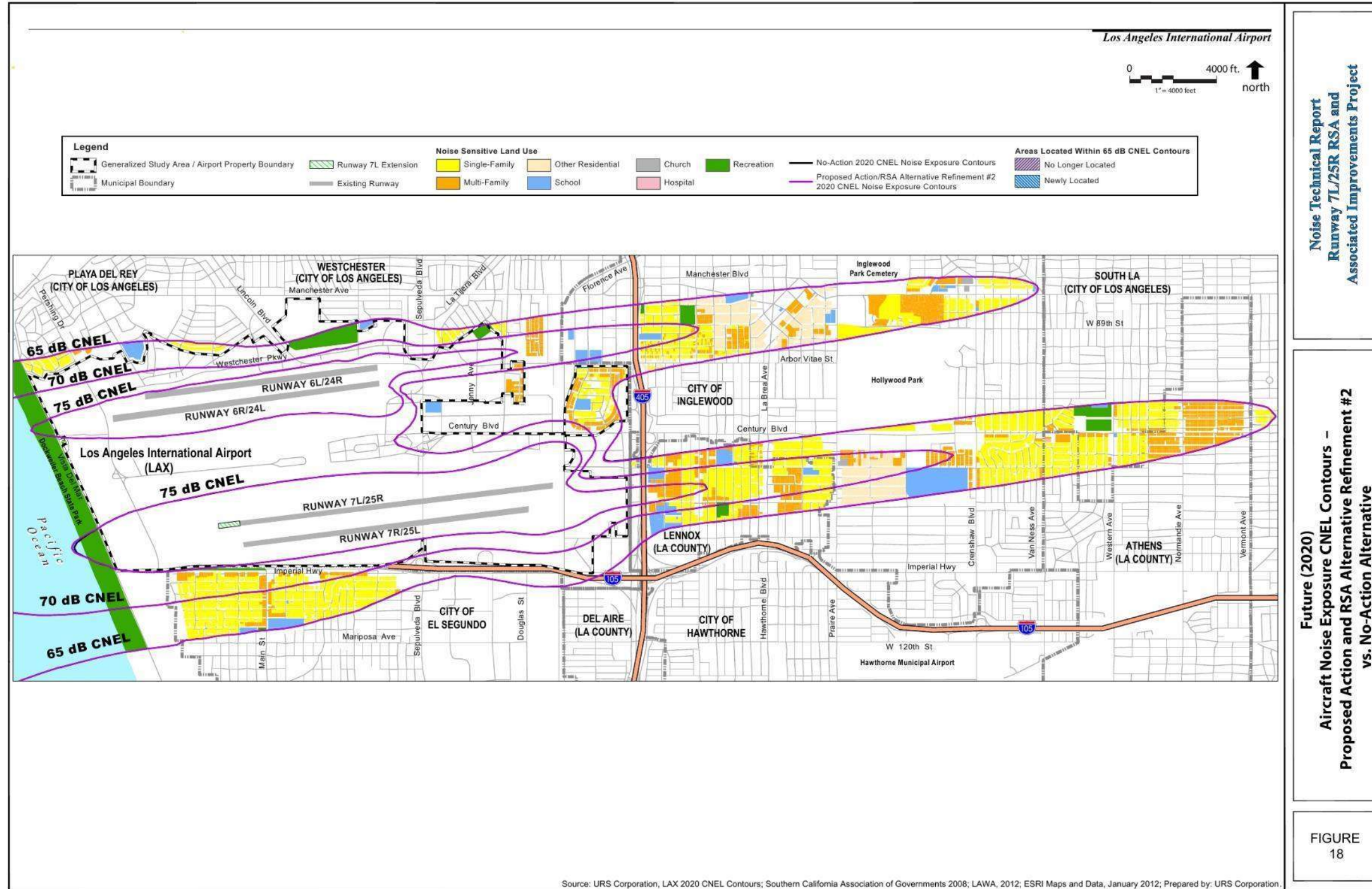
FIGURE 3-5:  
2015 NOISE CONTOUR COMPARISON – APPROVED ALTERNATIVE VS NO-ACTION ALTERNATIVE



Source: Final Environmental Assessment Appendix B Noise Technical Report for Proposed Runway 7L-25R Runway Safety Area and Associated Improvements Project, URS Corporation and Ricondo and Associates, Inc., August 2013

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FIGURE 3-6:  
2020 NOISE CONTOUR COMPARISON – APPROVED ALTERNATIVE VS NO-ACTION ALTERNATIVE

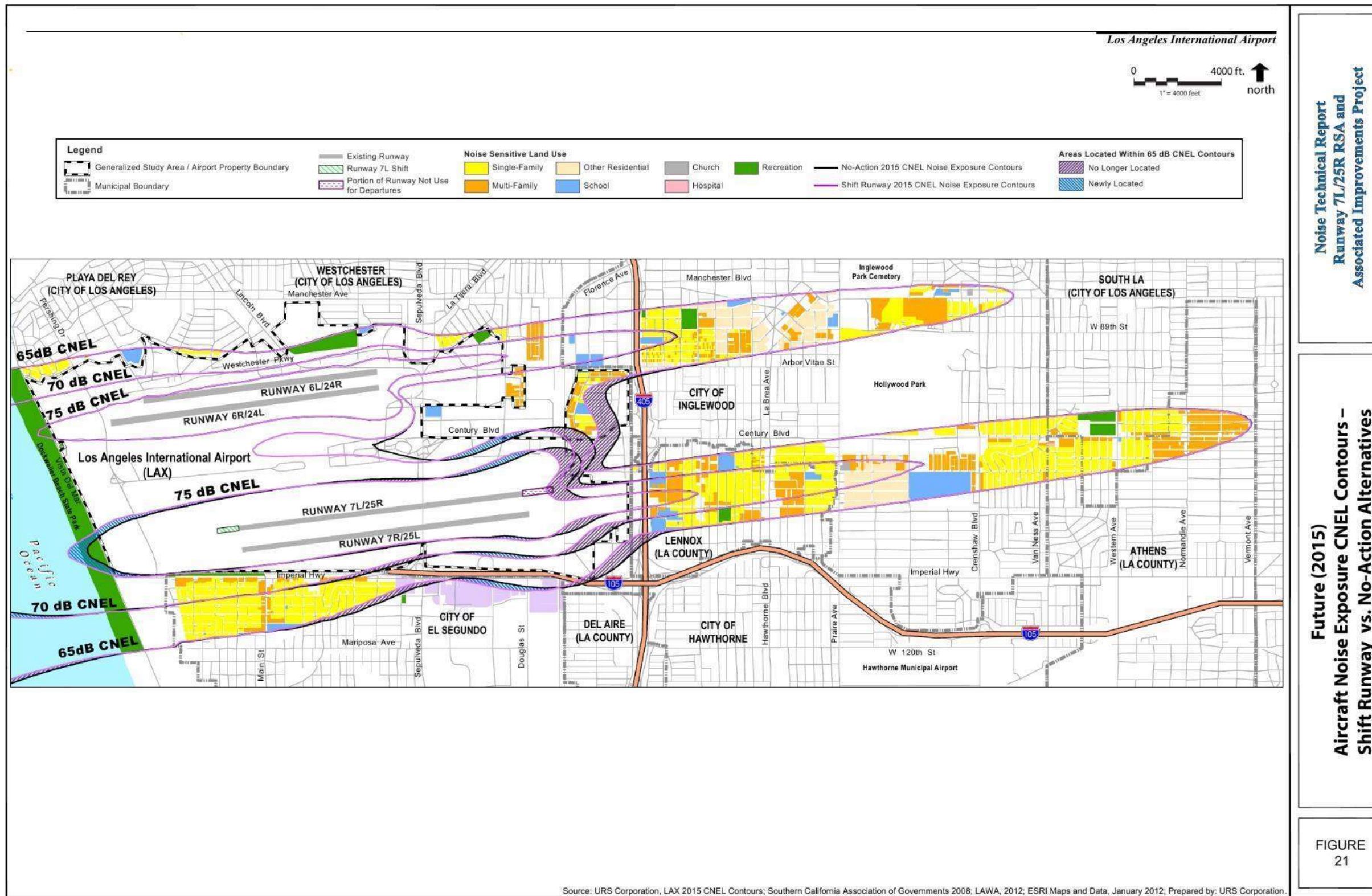


Source: Final Environmental Assessment Appendix B Noise Technical Report for Proposed Runway 7L-25R Runway Safety Area and Associated Improvements Project, URS Corporation and Ricondo and Associates, Inc., August 2013

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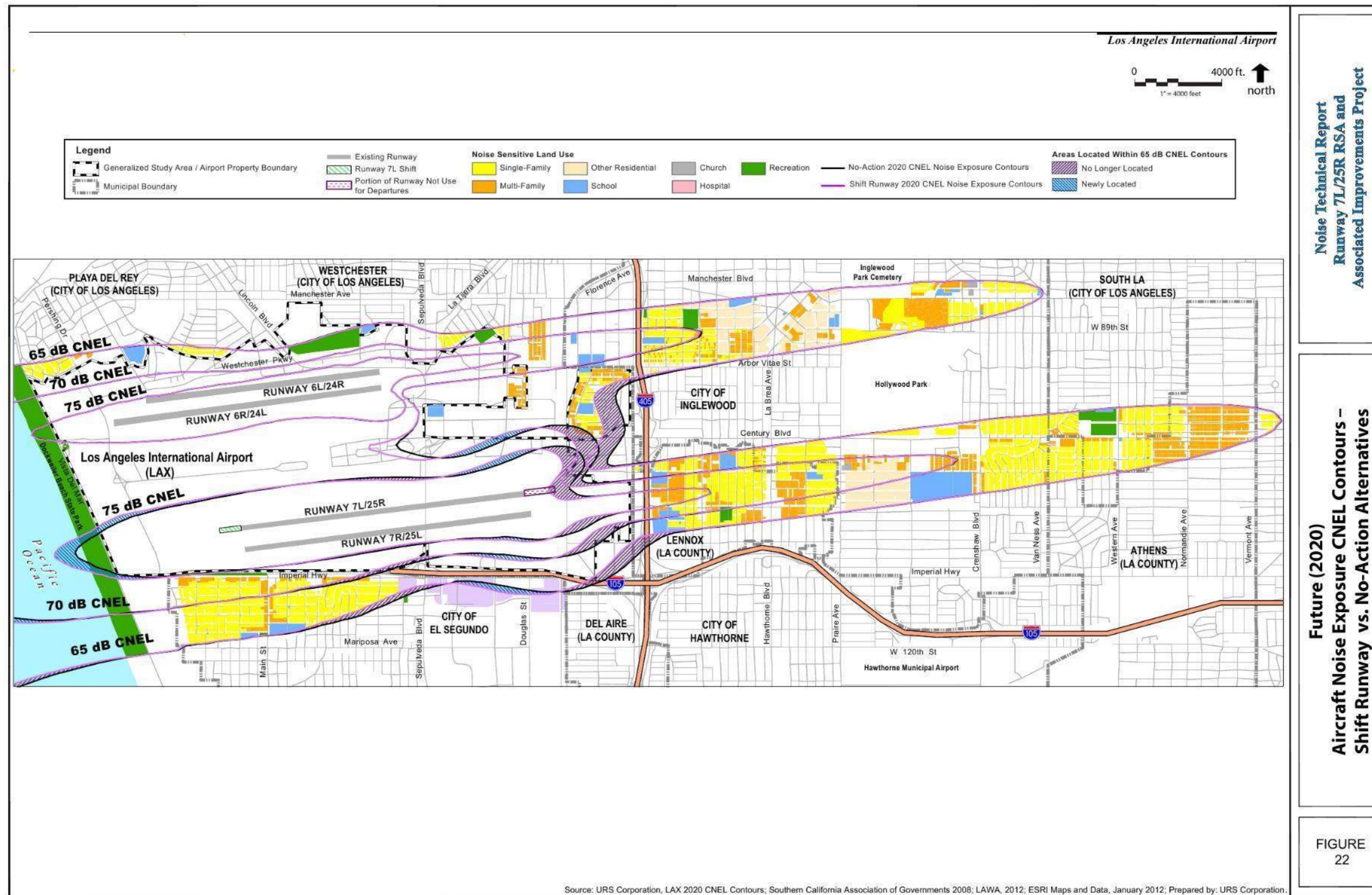
FIGURE 3-7:  
2015 NOISE CONTOUR COMPARISON – SHIFT ALTERNATIVE VS NO-ACTION ALTERNATIVE



Source: Final Environmental Assessment Appendix B Noise Technical Report for Proposed Runway 7L-25R Runway Safety Area and Associated Improvements Project, URS Corporation and Ricondo and Associates, Inc., August 2013

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FIGURE 3-8:  
2020 NOISE CONTOUR COMPARISON – SHIFT ALTERNATIVE VS NO-ACTION ALTERNATIVE



Source: Final Environmental Assessment Appendix B Noise Technical Report for Proposed Runway 7L-25R Runway Safety Area and Associated Improvements Project, URS Corporation and Ricondo and Associates, Inc., August 2013

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## 3.3 LAX OPERATIONAL IMPACTS

This section describes the potential impacts to LAX operations with the implementation of the Shift Alternative. The evaluation of operational impacts focused on the impacts at the east end of Runway 7L-25R. Airfield geometry on the west end of Runway 7L-25R is the same in the Approved Alternative and Shift Alternative.

Several connecting taxiways on the east end of the Runway would need to be realigned to facilitate the runway shift. These airfield geometry changes impact airfield operations, departure procedures, aircraft maneuvering and queuing, and airline operations.

The potential impacts summarized in this section are based on consultation with staff from LAWA, FAA Airport District Office, and FAA ATC. Airline stakeholders were also consulted, via a survey letter, to determine the impact to airline operations.

### 3.3.1 Airspace Impacts

LAX currently operates under a waiver for simultaneous departures from the North Airfield complex and South Airfield Complex. Aircraft departing Runway 25L or Runway 25R must initiate a 15 degree left turn within 2 nautical miles from the departure end of runway to create appropriate lateral separation from North Airfield departures. The FAA standard is for this turn to be initiated within 1 nautical mile of the departure end of runway. Runway 25R Area Navigation (RNAV) departure procedures instruct pilots to initiate a 15-degree turn prior to the first waypoint, known as DOCKR. DOCKR is located 1.55 nautical miles from the Runway 25R departure end of runway.

Shifting the Runway 25R departure end of runway may affect the location of DOCKR and could require relocation of the waypoint. FAA ATC is concerned about the runway shift and its potential impact on the existing waiver for simultaneous departures. It is not known if the waiver could be extended or if the waiver would be nullified. If LAX were to lose the waiver, it would force all departures from the North Airfield and South Airfield into a single departure stream. This may lead to operational inefficiencies and delays. Further coordination with FAA Air Traffic Organization may be necessary to address this issue.

It is important to note that change to the Runway 25R departure end of runway occurs with the Approved Alternative. No additional change occurs as a result of the Shift Alternative. Therefore, this impact is not considered in the evaluation of the Shift Alternative relative to the Approved Alternative.

### 3.3.2 Potential Increased Runway 25L Departures

In the Approved Alternative configuration, aircraft departing from Runway 25L have a three-minute departure hold time restriction when in-trail heavy aircraft departing Runway 25R via Taxiway B1. This departure hold time is an FAA mandated restriction in place to avoid wake turbulence. This restriction is in place when the following two conditions are met: 1) parallel runways are closer than 2,500 feet; and 2) runway ends are staggered more than 500 feet. This restriction is one factor that encourages pilots and controllers to cross Runway 25L and Runway 25R to takeoff on Runway 25R instead of waiting for Runway 25L during peak times. Additional departure hold times do not apply for successive aircraft departures on

Runway 25R. Therefore, pilots and ATC are more inclined to depart Runway 25R than accept potential departure delays by waiting to depart Runway 25L.

Implementation of Shift Alternative reduces the runway end stagger to less than 500 feet so the additional departure hold times would no longer apply for Runway 25L. Therefore, implementing the Shift Alternative may incentivize the use Runway 25L departures because of the enhanced operational flexibility. This conflicts with desires expressed by El Segundo representatives to reduce noise to the community by decreasing Runway 25L departures.

### 3.3.3 Departure Queuing

Aircraft departing on Runway 25R queue on Taxiway C and Taxiway B. The departure queue often extends west beyond Taxiway C6, resulting in congestion and delay for aircraft waiting to taxi to or push back from gates at Terminal 7 and Terminal 8. Shifting the Runway 25R end west would also shift the aircraft departure queue to the west. Shifting the Runway 25R departure queue farther west along Taxiway B would exacerbate taxiway congestion and delays in the terminal area near Terminals 6, 7, and 8.

### 3.3.4 Taxiway Geometry

The Shift Alternative includes Taxiway B and Taxiway C realignment to the north to meet Group VI parallel taxilane separation design standards. Increased separation may be necessary to accommodate direction reversal taxi maneuvers between parallel taxiways for all aircraft. The realigned taxiways may require removal of two cargo facilities – Air Freight Building #8 and Air Freight Building #10 – and portions of aircraft parking apron adjacent to the taxiways.

The Shift Alternative includes extension of Taxiway C east and provides access to Taxiway B via Taxiway B1. The Taxiway C extension is required as part of the runway shift to provide ATC operational flexibility. The Taxiway C extension allows for bidirectional access for the B1 aircraft parking apron. The Taxiway C extension provides more queuing and staging area for aircraft departing Runway 25R than is provided in the Approved Alternative. The extension allows aircraft to exit the departure queue and hold closer to the Runway 25R end when pilots are not ready for departure. Queuing and staging in this area would be restricted on portions of the taxiways and in certain conditions to protect the Precision Obstacle Free Zone, Part 77 Approach Surface, and the Threshold Siting Surface. Hold lines would be appropriately sited to identify the locations on the taxiways where these restrictions exist. Similar restrictions would be in effect during East Flow Operations to protect the Departure Surface and One-Engine Inoperative Surface on the east end of the Runway.

Taxiway F needs realignment to connect the Runway 25L end with the Runway 25R end. Right-angle runway-taxiway intersections are a required standard per FAA Advisory Circular 150/5300-13A, *Airport Design*. Implementing the Shift Alternative does not align the Runway ends. The Runway 25R end is approximately 165 feet farther east than the Runway 25L end in the Shift Alternative. A straight Taxiway F segment that connects east of the Runway 25L end does not meet FAA design standards and results in a prohibited aligned taxiway configuration. Therefore, a curved taxiway segment is required to facilitate right-angle intersections at the locations where Taxiway F connects to the runway ends.

Constructing a curved Taxiway F segment may increase the time required for aircraft to cross Runways 25L and Runway 25R. Accessing Runway 25R from Taxiway A is a more cumbersome process in the Shift Alternative than in the Approved Alternative. Aircraft do not commonly hold on Taxiway F between the runways. Aircraft holding in this location would impact the Precision Obstacle Free Zone and Instrument Landing System critical area. Additionally, the runway centerline-to-centerline separation restricts the size of aircraft that can hold between the runways on Taxiway F. Therefore, ATC typically provide clearance to cross both runways at a time when neither runway is occupied. A large radius taxiway turn is recommended to minimize potential pilot confusion and allow aircraft to maintain higher taxi speeds through the curve.

Constructing a taxiway parallel to and west of Taxiway F may also enhance ATC operational flexibility. The taxiway could connect the Taxiway H stub-out to Taxiway B. It allows aircraft to exit and enter Runway 7L-25R in cases when pilots are not ready for departure without having to taxi to Taxiway J. This taxiway connection also allows aircraft to hold facing east-west on the Taxiway H stub-out allowing aircraft to cross one runway at a time. Holding on the Taxiway H stub-out would be prohibited during Instrument Meteorological Conditions because aircraft would penetrate the Instrument Landing System critical area for the glideslope antenna. The north-south portion of this taxiway configuration parallel to Taxiway F would be greater than 500 feet west of the Runway 25R end. This results in the aforementioned three-minute in-trail separation restriction for aircraft departing Runway 25R from this intersection. Therefore, the operational benefit of this configuration may be limited. Further exploration of this taxiway configuration may be warranted if the Shift Alternative is implemented.

### 3.3.5 Airline Operational Impacts

Preliminary analysis conducted in 2013 indicated that shifting the Runway 832 feet to the west (thus reducing the distance between the start end of the runway and controlling obstacles west of the South Airfield) will impact certain long-haul, twin-engine departures. The analysis was general in nature and did not account for the varying operational procedures and policies of individual airlines. Therefore, nine airlines were surveyed to determine if there is objection to the Runway shift. Airlines were asked to participate in the survey if they currently operate long-haul, twin-engine routes or if they were one of the top carriers at LAX.

The survey requested airlines to evaluate use of Runway 25R and the operational impact of the shift with particular focus on long-haul, twin-engine departures. Airlines were asked to consider their proprietary operational parameters (e.g., equipment type, stage length, typical load) when responding. The goal was to have chief pilots, flight dispatch, and route-planning representatives involved with the completion of the survey. Airlines were asked to respond to the following three questions using as much detail as possible:

1. Will shifting Runway 7L-25R 832 feet to the west have an impact on your airline's operation at LAX?
2. How many flights are likely to be impacted as a result of the shift?
3. What is your airline's likely response to the impact of the shift (if any)?

The airline responses are summarized in *Table 3-2*. Six airlines respondents indicate that their operation would be impacted if the Shift Alternative were implemented. Impacted airlines would incur payload penalties (up to 15,900 pounds) as a result of the runway shift. Runway 25R tailwinds (as little as 3 knots) or temperature (as low as 77 degrees Fahrenheit) are contributing factors to operational impacts. Objects located in the dunes west of the South Airfield (namely the VORTAC Doppler Monitor Antenna) present operational challenges for the airlines. An airline respondent notes that a lesser impact (reduced takeoff weight penalty) results if the Doppler Monitor Antenna has a frangible mount.

Three impacted airlines indicated they would restrict passenger seat sales or cargo booking to offset the payload restrictions. Two impacted airlines indicated that the operational impact was a “serious concern” and that the payload penalty “would not be acceptable.” Airline responses most often indicated that the Boeing 777-300ER is impacted. The Boeing 777-300ER is a popular aircraft used by many long-haul route operators. According to a Boeing aircraft order and delivery summary<sup>5</sup>, the 777-300ER is the best-selling airframe within the 777 family – representing the most orders and deliveries to-date. The first 777-300ER was delivered in 2004 and the airframe is likely to be in service for the foreseeable future.

One airline respondent recognized that shifting Runway 7L-25R enhances operational flexibility for Runway 7L departures. The airline noted that shifting the Runway 25R endpoint farther from objects east of the South Airfield would allow departures with heavier loads or during adverse conditions where Runway 25R departures are otherwise impacted. Pilots may opt to depart via Runway 7L even during normal West Flow Operations if Runway 25L departures are impacted. Pilots are permitted to request nonstandard departure procedures to facilitate the safe operation of their aircraft. Runway 7L departures during West Flow Operations may result in airfield and airspace congestion because it may be challenging for ATC to accommodate nonstandard departure routes. Departing Runway 7L may also result in additional noise impacts to noise sensitive land uses as the aircraft departs east over nearby communities

<sup>5</sup> Boeing Order and Deliveries report, [www.boeing.com/boeing/commercial/overview/index.page](http://www.boeing.com/boeing/commercial/overview/index.page), accessed November 2014



**TABLE 3-2:  
AIRLINE OPERATIONAL IMPACT SURVEY RESPONSES**

| Airline Respondent | Impact to Operations  | Number of Flights Impacted                  | Airline Response to Shift  |
|--------------------|---|---|--|
| 1                  | None  | n/a   | n/a  |
| 2                  | Yes<br>Lift capacity reduced for 2 fleets   | May impact future summer flights            | Restrict cargo bookings out of LAX   |
| 3                  | Yes<br>Up to 6,600 lbs takeoff weight restriction with tailwind > 3knts and temperature of 89°F         | Not Specified                               | Not Specified  |
| 4                  | Minimal   | n/a   | n/a  |
| 5                  | Yes<br>- Minor impact to 747-400 operations<br>- Payload penalty for 777-300ER when temperatures > 79°F | May impact summer 777-300ER flights         | Reduce passengers or cargo   |
| 6                  | Yes<br>Performance may be affected with tailwind > 5knts and temperatures > 77°F                        | Not Specified                               | Not Specified  |
| 7                  | None<br>Assuming current elevation/grade/pitch maintained in shifted runway                             | n/a   | n/a  |
| 8                  | Yes<br>Up to 15,900 lbs takeoff weight restriction  | Not Specified                               | Not Specified  |
| 9                  | Yes<br>Up to 11,000 lbs takeoff weight restriction with tailwind > 4knts                                | - 10% / year<br>- 30% during winter holiday | - Seat capping<br>- Lower cargo acceptance rate<br>- Request Rwy 7L departures when tail winds > 4knts |

Source: RS&H, 2015

## 3.4 VORTAC RELOCATION OPPORTUNITIES AND CHALLENGES

This section provides a general description of the actions required of LAWA and FAA in the event that the LAX VORTAC needs to be relocated to make the runway shift feasible. The FAA Air Traffic Organization Western Service Center was consulted to better understand these opportunities, challenges, and provide insight regarding the high-level feasibility of relocating the LAX VORTAC.

### 3.4.1 Very High Frequency Omnidirectional Range (VOR) Overview

A VOR is a navigational system radiating very high frequency radio signals to compatible airborne receivers. This NAVAID gives pilots a direct indication of bearing relative to the VOR facility.

Several types of VOR exist depending on the required function of the equipment. The LAX facility is a Doppler VORTAC station located in the dunes west of Runway 7L-25R. A VORTAC is a collocated facility comprised of standard VOR equipment for civil use and Tactical Air Navigation equipment that provides supplementary navigational information specific to the needs of military users. The LAX station also has a higher power output necessary to provide long-range, positive course guidance to aircraft including those enroute at high altitudes. These reasons make the LAX VORTAC an important NAVAID for aircraft bound for or departing LAX as well as other aircraft traveling through the area.

### 3.4.2 General Project Coordination and Elements

This section describes general steps to be undertaken to relocate a VOR. Preparing Form FAA 7460-1, *Notice of Proposed Construction or Alteration*, is one of the first steps to move forward in the process of shifting Runway 7L-25R and/or relocate the VOR. The accompanying analysis evaluates the effect of the proposed construction on operating procedures with air navigation and identifies mitigating measures to enhance safe air navigation. Several mitigation options could be considered if the LAX VORTAC was determined to be a hazard to air navigation as a result of the runway shift.

One such solution is to modify the existing departure procedures. Non-standard climb rates and/or non-standard higher departure minimums can be implemented to avoid obstacles penetrating the departure surface. The minimum required climb gradient is 200 feet per nautical mile but many aircraft may be able to exceed this climb gradient – especially new aircraft.

Removing an existing VOR station may also not require a direct replacement. The capability of other stations in the area could potentially be modified to substitute the information currently provided by a removed VOR. Increasing the power output of other VORs in the area may be possible to compensate for the removal of a VOR system. Direct replacement of a VOR, however, may be the only solution. This determination needs to be made in consultation with the FAA as part of a more thorough analysis.

FAA documentation states that initial airspace review may need to be conducted as early as three years in advance of construction. This provides enough time for the applicable FAA lines of business to review – Technical Operations, Flight Procedures, Flight Standards, Air Traffic / Operations Support Group, Runway Safety, and the Airport District Office. Coordination with the Department of Defense may be required since

the station also serves military interests. It takes about six months to one year to perform a siting study and at least two years for FAA to redesign impacted instrument procedures. A siting study may take longer if a VOR is to be relocated off-airport because it requires additional coordination with third-party landowners.

FAA Order 6820.10, *VOR, VOR/DME, and VORTAC Siting Criteria*, provides guidance and reference material to be used in practical application of VOR equipment. The document describes procedures and techniques that apply to the initial evaluation, selection, and acquisition of sites for the NAVAID. It outlines guidance with site improvement and the minimization of performance degradation due to multipath. The Order applies to new and relocated facilities.

Finding a suitable location for a new VOR may be challenging because of the specific siting requirements. Line of sight is an important component of siting to facilitate unobstructed signal transmission. Additionally, siting should consider impacts to existing flight procedures because all terminal and enroute procedures predicated on wayfinding via the LAX VORTAC need to be adjusted.

The FAA Airports District Office and Technical Operations Services are the groups with whom LAWA would first coordinate to assess relocation feasibility. Technical Operations Services would be most involved with the technical aspects associated with VORTAC siting and provide feedback on the VORTAC site selection process.

FAA Air Traffic Organization Western Service Center staff indicated that VOR relocation is a costly project. The demolition of the existing VORTAC station and land acquisition increase project costs. FAA generally prefers to acquire land for the NAVAIDs instead of entering long-term leases with landowners. Ideally, the FAA prefers to locate NAVAIDs on airport property to provide protection from encroachment of non-compatible land uses. Easements are used to protect from encroachment but are not always effective. If non-compatible land uses (i.e., private development) encroach on a VOR, there may be impacts to the operational capability and signal integrity of the NAVAID.

### 3.4.3 Anchorage VOR Relocation Case Study

The recent relocation of a VOR station in Anchorage, Alaska was used as a case study to examine potential opportunities and challenges of relocating a VOR station. The new Anchorage VOR became operational in February 2012. The Anchorage VOR was relocated approximately eight miles east from its previous location to property within the Ted Stevens Anchorage International Airport boundary. The VOR relocation was prompted due to proposed development of a wind farm that conflicted with the original station. The process of relocating the Anchorage VOR took approximately seven years from the start of FAA involvement to the commissioning of the new station.

Relocation of the Anchorage VOR was a challenging task for the FAA and Ted Stevens Anchorage International Airport staff. Restructuring of certain terminal and enroute flight procedures associated with the VOR were required with the station relocation. Recalibration of several NAVAIDs at Ted Stevens Anchorage International Airport and at other airports in the region was also required as part of this project.

One notable opportunity was upgrading the old system from a conventional VOR system to a Doppler VOR during the relocation process. A Doppler VOR is advantageous because it is generally more tolerant of other structures in the area and inherently more accurate than a conventional VOR.

### 3.4.4 LAX VORTAC Relocation Feasibility Assessment

FAA Air Traffic Organization Western Service Center staff indicated that relocating the LAX VORTAC would be very challenging. The LAX VORTAC is an important facility based on the regularity of use and the high number of procedures with which it is associated. Based on a draft FAA study, approximately 50 instrument procedures for LAX are associated with the LAX VORTAC – including Standard Terminal Arrival Route procedures, Standard Instrument Departures procedures, and navigational waypoints. Several airways associated with the VORTAC would also be impacted – one T-Route (low-level Area Navigation) and three Q-Routes (high-altitude airways). Some instrument procedures would also be affected for other airports in the region, including Van Nuys Airport and Santa Monica Municipal Airport. These procedures, waypoints, and airways need to be redesigned if the LAX VORTAC were relocated.

LAWA would first assess the feasibility of relocating the LAX VORTAC within the LAX property boundary – perhaps within the dunes. Environmental analysis would likely be required to assess the impacts of relocating the VORTAC near or within the El Segundo Blue Butterfly Habitat Restoration Area. However, relocating the VORTAC to a lower elevation from its existing elevated position on the dunes may affect signal integrity. FAA Air Traffic Organization Western Service Center staff indicated that the current location of the LAX VORTAC is ideal as its elevation and unobstructed 360-degree signal provide good line of sight to aircraft.

Alternatively, the LAX VORTAC could potentially be modified in its existing site so it no longer is the controlling obstacle for Runway 25R departures. The Doppler Monitor Antenna attached to the north side of the VORTAC equipment shelter is the highest point associated with the VORTAC. FAA Air Traffic Organization Western Service Center staff believes that it may be feasible to relocate the equipment shelter and/or the Doppler Monitor Antenna. Relocation of these components would be less complicated and less expensive than relocation of the entire VORTAC and would not affect the VORTAC signal integrity. Further, work and costs associated with redesigning the instrument procedures, waypoints, and airways would be avoided. This modification could be conducted in less time than is required to relocate the entire VORTAC station and redesign the instrument procedures.

## 3.5 IMPACT OF SHIFT SUMMARY

Shifting Runway 7L-25R may also have unintended consequences. Cumbersome taxiway alignments and removal of wake turbulence hold times make Runway 25L departures more attractive, which may increase Runway 25L departures. These potential resulting impacts were not taken into consideration in the 2013 Final EA. Therefore, the 2013 noise analysis results do not reflect the noise impacts associated with the potential increase in Runway 25L departures.

The cost of the Shift Alternative can be measured in the capital cost of construction. Additionally, several airlines indicate that the Shift Alternative impacts their operation. Lost airline revenue and loss of long-haul service may result from the runway shift. These costs are difficult to precisely gauge but would be considered a major negative economic impact to Los Angeles and the region. Impact to airlines may be mitigated if the LAX VORTAC and its associated equipment is modified or relocated. Relocation of the LAX VORTAC is a costly project.

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CHAPTER 4

*LAX OPERATIONS AND NOISE*

The Airport property boundary are contiguous to several communities to the north, south, and east of the Airport. LAWA continuously works to foster an amicable relationship between these communities and the Airport. LAWA has put forth considerable effort to being a good neighbor and minimizing adverse airport impacts on land uses near the Airport.

LAWA has a long-standing history of working to reduce the impacts of the noise profile created by aircraft. The Runway 7L-25R Shift Study was borne as a result of these noise abatement efforts. The purpose of the Runway 7L-25R Shift Study is to evaluate the potential impacts of shifting the Runway west 832 feet as part of the solution to resolve the non-standard RSA that was purported to offer noise benefits to the local community by reducing the number of residences within the 65 dBA CNEL counter. LAWA agreed to

**LAWA NOISE MANAGEMENT WEBSITE**

[http://www.lawa.org/welcome\\_lax.aspx?id=788](http://www.lawa.org/welcome_lax.aspx?id=788)

conduct the study and maintain the ability to implement the runway shift, pending the results of the study. This is indicative of LAWA's commitment to supporting the interests of the local communities.

This chapter summarizes LAWA's other recent, ongoing, and recommended efforts to reduce airplane noise impacts as it relates to aircraft operations.

## 4.1 LAX NOISE PROFILE

The land use to the north and south of the Airport is mostly residential and commercial. Land uses to the east of the Airport are primarily commercial and industrial. The nearest noise-sensitive areas to the Airport includes:<sup>6</sup>

- » Residential uses in the City of El Segundo, south of the Airport
- » Multi-family homes along Century Boulevard east of Aviation Boulevard
- » Hotels and single-family homes in the area east of the Airport, at the northeast corner of South La Cienega Boulevard and West 104th Street

Noise sensitive receptors adjacent to the Airport include eight parks / areas of open space, 27 schools, 4 fire stations, 1 healthcare facility, and 10 religious facilities.<sup>7</sup>

Noise sources affecting the noise-sensitive uses around the Airport include aircraft noise, major highways, and major arterial roadways. Airport noise results from aircraft departing, landing, and taxiing operations. Noise levels from aircraft departure operations commonly exceed 110 dBA at locations near the Airport runways, according to the 2013 Final EA. A major contributor to noise proximate to the east end of Runway 25R is the departure backblast noise generated around the point of aircraft takeoff roll. According to the

<sup>6</sup> Final Environmental Assessment of Proposed Runway 7L-25R Runway Safety Area and Associated Improvements Project, URS Corporation and Ricondo and Associates, Inc., August 2013

<sup>7</sup> Sensitive land uses within ¼ mile of the 2013 Final EA Generalized Study Area



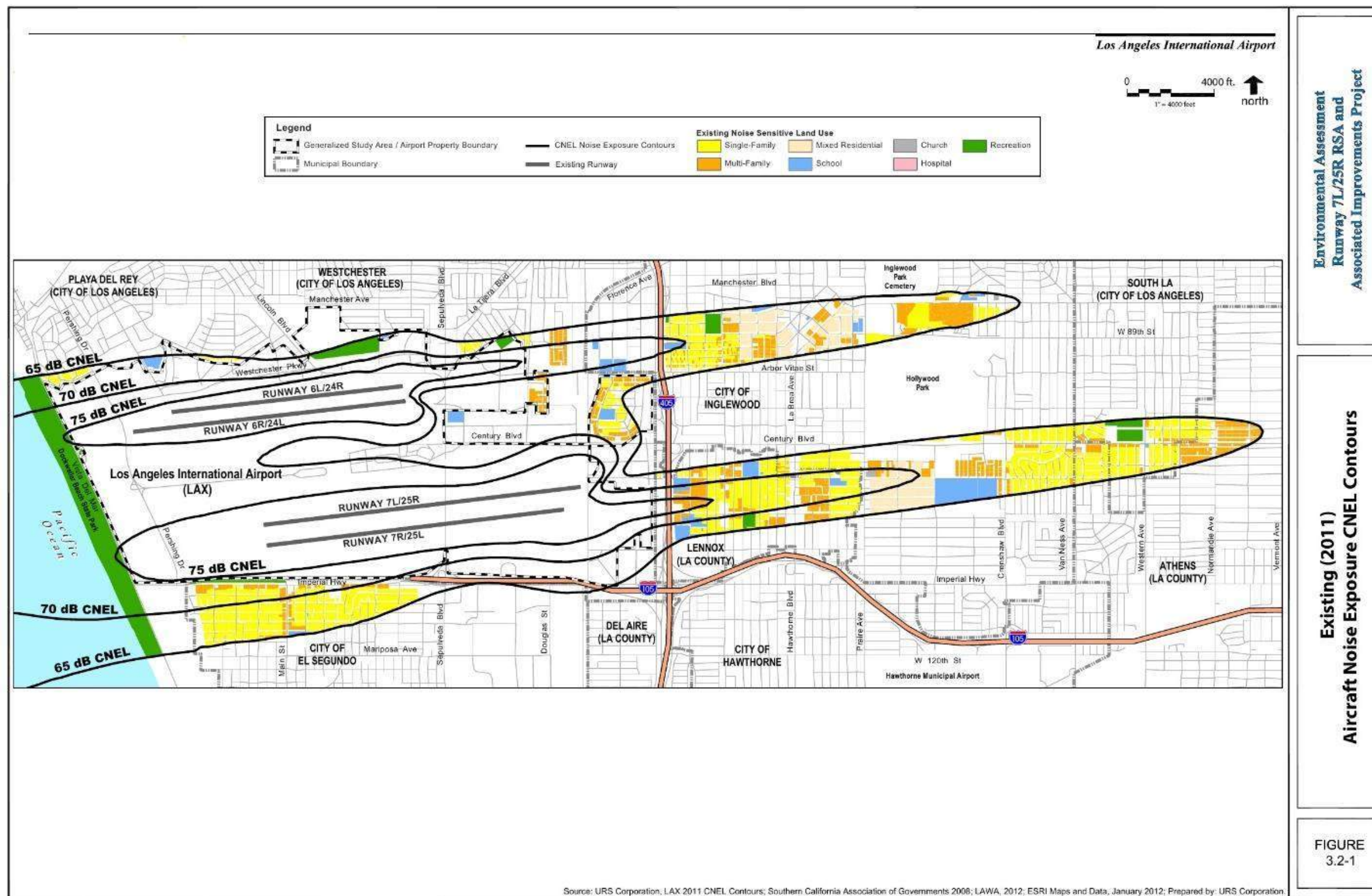
*LAX Quarterly Noise Reports*, the Boeing 747 aircraft has the highest takeoff noise level for aircraft that operate at the Airport.

*Figure 4-1* depicts the 2011 noise contours from the 2013 Final EA. A total of 12,093 single- and multi-family dwelling units (representing 38,514 people) are located within the 65 dBA CNEL.

*Figure 4-2* depicts the noise contour from the Third Quarter of 2014 as published in the *LAX Quarterly Noise Reports*. A total of 10,145 single- and multi-family dwelling units (representing 35,655 people) are located within the 65 dBA CNEL. Noise values and contours in the *LAX Quarterly Reports* include the current quarter and three previous quarters of noise measurements.

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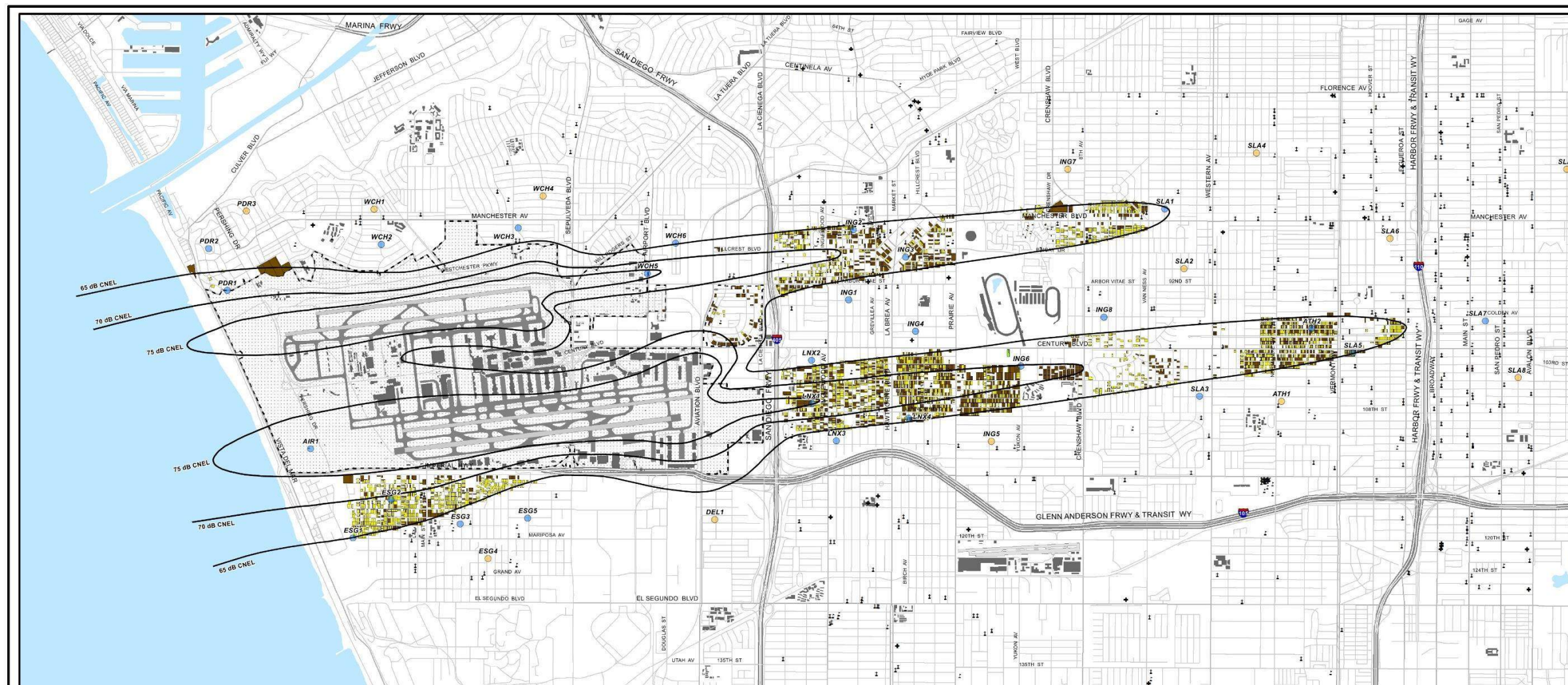
FIGURE 4-1:  
2011 NOISE CONTOURS



Source: Final Environmental Assessment of Proposed Runway 7L-25R Runway Safety Area and Associated Improvements Project, URS Corporation and Ricondo and Associates, Inc., August 2013; Figure 3.2-1

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FIGURE 4-2:  
2014 THIRD QUARTER NOISE CONTOURS



**ANNUAL CNEL VALUES (dBA)**

|      |      |      |      |       |      |      |      |      |      |      |      |      |      |      |
|------|------|------|------|-------|------|------|------|------|------|------|------|------|------|------|
| AIR1 | PDR1 | PDR2 | PDR3 | ESG1* | ESG2 | ESG3 | ESG4 | ESG5 | DEL1 |      |      |      |      |      |
| 79   | 68   | 62   | 58   | 65    | 68   | 63   | 59   | 61   | 54   |      |      |      |      |      |
| WCH1 | WCH2 | WCH3 | WCH4 | WCH5  | WCH6 | ING1 | ING2 | ING3 | ING4 | ING6 | ING5 | ING7 | ING8 |      |
| 55   | 62   | 61   | 58   | 75    | 63   | 61   | 66   | 67   | 69   | 58   |      | 61   |      |      |
| LNK1 | LNK2 | LNK3 | LNK4 | ATH1  | ATH2 | SLA1 | SLA2 | SLA3 | SLA4 | SLA5 | SLA6 | SLA7 | SLA8 | SLA9 |
| 74   | 63   | 62   | 65   | 60    | 66   | 65   | 59   | 61   | 59   | 64   | 62   | 64   | 61   | 61   |

**TECHNICAL NOTES**

\*The annual value shown for ESG1 is not a true annual value since it is calculated using less than four quarters of data.

**NOTES**

Noise Contours are generated using RealContours which supports the Federal Aviation Administration's Integrated Noise Model (INM) version 7.0. The modeled contour is based on annualized operational information gathered for the 12-month period ending December 31, 2013. The RealContours program is run yearly and the resultant contour is adjusted to the current quarter's Noise Monitoring Station (NMS) annual average aircraft CNEL.

Sources of information include: FAA's Automated Radar Terminal System (ARTS) Data, and FAA Tower Traffic Records.

Dwelling unit calculations are based on estimates made using 2009 assessor information, supplemented with local land use updates. Population estimates reflect the 2000 census data, (including updated 2009 estimates), for persons per dwelling unit. The new landuse database used to generate this report reflects all progress made through LAWA's Sound Insulation Grant Program (previously the Land Use Mitigation Program) through December 31, 2013.

Map projection is in State Plane Feet based on North American Datum of 1983 (NAD83), and is located in Zone 5 of the California Coordinate System of 1983.

Reproduced with permission granted by THOMAS BROS. MAPS. This map is based on data copyrighted by THOMAS BROS. MAPS. It is unlawful to copy or reproduce all or any part of this map, whether for personal use or resale, without permission.

**LEGEND**

- Residential - Single Family
- Residential - Multi-Family
- Residential - Mobile Home
- Airport Property
- Landmarks
- Noise Contours
- Streets
- Noise Monitor (Required for Title 21)
- Noise Monitor (Not required for Title 21)
- Churches
- Hospitals
- Schools

**Los Angeles World Airports 3Q14**  
Los Angeles International Airport

California State Airport Noise Standards Quarterly Report

0.5 0 0.5 1 Miles

**LAWA Noise Management**  
Environmental Affairs Officer: Kathryn Pantoja  
Checked by: Joanne Choi, Environmental Specialist III  
Prepared by: James C. Dunagan III, Environmental Specialist II  
Prepared on: November 06, 2014

Source: 2014 Third Quarter LAX Quarterly Noise Report

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## 4.2 NOISE REDUCTION CONCEPTS

LAWA has long been an advocate for minimizing airplane noise on the local communities. LAWA's efforts include the close coordination with community leaders. LAWA and representatives of El Segundo hold regular meetings to discuss airport issues affecting the El Segundo community, including the following:

- » Early turns over El Segundo, and
- » Runway 25L departures, especially cargo aircraft at night.

### 4.2.1 Early Turns

An "early turn" occurs when an aircraft on a West Flow departure from any of the four LAX runways initiates a turn prior to reaching the shoreline that results in the aircraft flying over the community to either the north or south of the Airport. LAWA has several ongoing efforts that support this goal.

Section 5 of the *LAX Rules and Regulations* document specifically prohibits early turns in the Operational Responsibilities subsection. The purpose of this document is to provide airport users with the compendium of rules, regulations, procedures, and general information governing activities at the Airport. LAWA expects airport tenants and users to be informed of the document's contents, as it is important to comply with airport rules to maintain the safe and efficient operation of the Airport.



Early turn noise mitigation instructions are also included on the FAA Airport/Facility Directory for LAX. The Airport/Facility Directory informs pilots of important airport information. Informational signs are located near the east end of all LAX runways to remind pilots that aircraft are to maintain runway heading until past the shoreline before commencing any turns.

LAWA hosts a LAX/Community Noise Roundtable meeting every two months. The LAX/Community Noise Roundtable was created in September 2000 and is intended to reduce and mitigate the adverse noise impacts on the surrounding communities. Membership of the Roundtable consists of local elected officials and staff, representatives of congressional offices, members of recognized community groups, the FAA, the airlines and LAWA Management. This forum provides a mechanism that attempts to ensure cooperation between the Airport and local impacted communities in achieving noise impact reduction to those communities, wherever possible, without shifting noise from one community to another.

LAWA actively monitors early turn occurrences through the Early Turn Notification Program. Early turns that do occur are classified as follows: FAA ATC instructed, pilot initiated, wind drift, or unknown. LAWA coordinates closely with FAA to minimize ATC instructed early turns. Enhanced ATC departure instructions were instituted on April 8, 2013 in an attempt to minimize community overflights. A description of the enhanced ATC departure instructions is included in Chapter 2.

LAWA also directly engages airlines and pilots to minimize early turn occurrences. Airlines responsible for early turns are contacted and asked to identify strategies of how future uninstructed early turns (pilot initiated, wind drift, and unknown reason) will be avoided.

Data analysis shows that early turn occurrences have noticeably decreased after the implementation of the enhanced departure instructions and other LAWA efforts. The early turn occurrence average for the El Segundo gate was about 37 per month during the period of April 2012 to March 2013. Early turn occurrence for the El Segundo gate has decreased to about 28 per month during the period of April 2013 to November 2014.<sup>8</sup> Chapter 2 includes additional detail about the effectiveness of minimizing early turns.

### Potential Concepts

LAWA and FAA ATC efforts have been successful in reducing early turn occurrences in recent years. The following concepts describe additional efforts that may be undertaken to further minimize early turn occurrences.

Turboprop aircraft account for the greatest percentage of early turn occurrences. Turboprop early turns are FAA ATC instructed maneuvers 64 percent of the time, during the period of April 2013 to November 2014. Therefore, early turn occurrences may be further minimized by focusing on FAA ATC instructed early turns by turboprops.

ATC instructs turboprops to turn early to make way for faster, trailing aircraft queued for departure or to avoid the wake created by larger, preceding aircraft. FAA ATC has the authority to instruct departing aircraft to turn before reaching the shoreline to ensure the safe and efficient operation of the Airport.

Long-term, it is expected that regional jets will replace the passenger airline turboprop fleet. Regional jet aircraft are faster than turboprops so regional jets may not need to turn early to make way for trailing aircraft. However, regional jets would still be subject to wake turbulence by larger, preceding aircraft. Uninstructed early turns (pilot initiated, wind drift, and unknown reason) account for approximately 70 percent of early turn occurrences committed by jet aircraft. Increased airline and pilot outreach may minimize these pilot initiated and wind drift related jet early turn occurrences. Detailed information may be distributed more regularly to airlines and request that it be disseminated with pilots that operate at LAX regularly. Similar information can be distributed within fixed-base operator flight planning rooms to increase general aviation pilot awareness.

Nighttime early turns are not common but eliminating these nighttime overflights may result in a community perception of greater early turn reduction. Aircraft noise is generally more noticeable during this period due to the decrease in other background noise sources.

<sup>8</sup> Community Overflights Summaries, LAWA Noise Management Office, 2012 - 2014



## 4.2.2 Runway 25L Departures

El Segundo representatives have expressed a desire to minimize departures from Runway 25L to reduce aircraft noise. Runway 25L departures have a greater noise impact on the El Segundo community than Runway 25R departures since it is the closest runway to the community. El Segundo representatives are most concerned with minimizing nighttime cargo operations.

LAWA implemented the PRUP in 1972 to reduce noise impacts from aircraft operations. LAWA recognized that the loudest operations at the Airport are typically from departures. Therefore, the PRUP encourages use of the inboard runways (e.g., Runway 7L-25R) for departures and the outboard runways (e.g., Runway 7R-25L) for arrivals. A detailed description of the air traffic flows and preferred runway use is included in Chapter 2.

LAWA analyzed the implementation of the PRUP in the 2014 PRUP Report. Overall adherence to the PRUP is high. Over 90 percent of all operations at the Airport use the preferred runways.<sup>9</sup> Passenger and air cargo operations compliance is also high – more than 93 percent of departures used the inboard runway between 2010 and 2013.

**2014 LAX PRUP REPORT**

[http://www.lawa.org/uploadedFiles/LAX/noise/PDF/Final%20LAX%20Preferential%20Runway%20Use%20Policy%20Report%20041114\\_Web.pdf](http://www.lawa.org/uploadedFiles/LAX/noise/PDF/Final%20LAX%20Preferential%20Runway%20Use%20Policy%20Report%20041114_Web.pdf)

LAWA closely coordinates with FAA ATC and engages airlines to facilitate adherence to the PRUP. LAWA worked with FedEx at LAX/Community Noise Roundtable meetings in 2013 to increase the use of Runway 7L-25R for departures. As a result, FedEx instituted policies whereby all FedEx pilots are to request Runway 25R for departure to reduce noise impacts on the El Segundo community.

Approximately 91 percent of departures from the South Airfield adhered to the PRUP and used Runway 7L-25R, between 2010 and 2013. As a result, an average of 42 daily departures occurred from Runway 7R-25L during the same time period. Eighteen of the 42 Runway 7R-25L departures occurred at nighttime, between 10 p.m. and 7 a.m. The 2014 PRUP Report acknowledged that nighttime compliance is lower than expected. This is due to regular nighttime runway closures and the operational limitations of Runway 7L-25R. Nighttime runway closures most often occur to allow routine maintenance, which must be performed at night when aircraft operations are low. Additionally, larger Group VI aircraft cannot easily be accommodated on Runway 7L-25R because of the non-standard lateral separation between the Runway and Taxiway B.

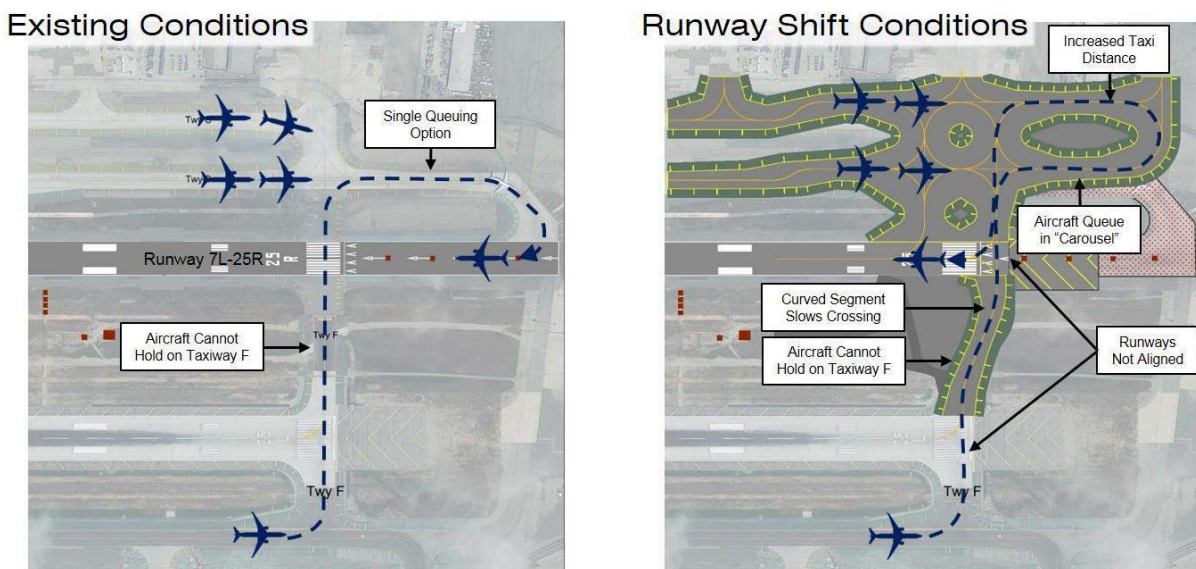
LAWA uses a contra-flow operation, also known as Over-Ocean Operations, between midnight and 6:30 a.m. The 2014 PRUP Report cites that Over-Ocean Operations provide a substantial noise benefit to the communities east of the Airport. During this time, PRUP adherence is affected because some operational limitations are placed on runway use to facilitate a safe contra-flow operation. This results in a generally higher proportion of departures from Runway 7L-25L during nighttime hours compared to other times of the day.

<sup>9</sup> LAX Preferential Runway Use Policy Report, LAWA Environmental Services Division, April 2014

## Runway Shift Conclusions

Shifting Runway 7L-25R may result in increased Runway 25L departures – an unintended consequence of the runway shift. Today, aircraft originating at facilities south of the South Airfield often depart from Runway 25R despite the fact that it is somewhat cumbersome. Shifting Runway 7L-25R would result in longer taxi distances and a more challenging queuing process for these aircraft to depart Runway 25R compared to the existing configuration (illustrated in *Figure 4-3*). The curved Taxiway F segment may be confusing to pilots and may increase the time to cross both runways. This cumbersome taxiing and queuing procedure would dissuade pilots and ATC from departing from Runway 25R.

**FIGURE 4-3:  
CHALLENGING ACCESS TO RUNWAY 25R**

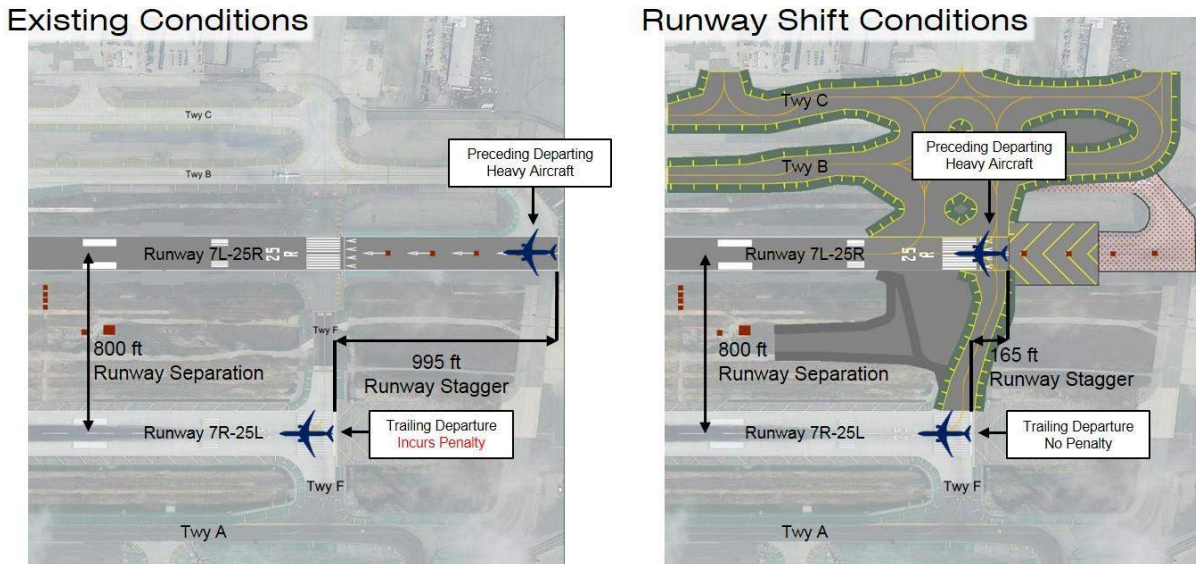


Source: RS&H, 2015

Additionally, operational incentives that currently encourage Runway 25R departures would no longer apply if Runway 7L-25R were shifted (illustrated in *Figure 4-4*). Today, aircraft that depart from Runway 25L encounter additional departure hold times after large aircraft depart Runway 25R. These FAA mandated hold times are in place because of the staggered runway configuration. This has a compounding effect and may result in departure delays, especially during periods of high departure demand at the Airport. Additional departure hold times do not apply for aircraft departing Runway 25R making it a more efficient option for departures. Therefore, pilots and ATC are more inclined to depart Runway 25R than accept potential departure delays by waiting to depart Runway 25L.

Shifting Runway 7L-25R eliminates the aforementioned staggered runway configuration. The additional departure hold times would no longer apply for Runway 25L potentially resulting in additional Runway 25L departures. Therefore, shifting Runway 7L-25R conflicts with the goal of minimizing Runway 25L departures.

**FIGURE 4-4:**  
**INCREASED DEPARTURE HOLD TIMES**



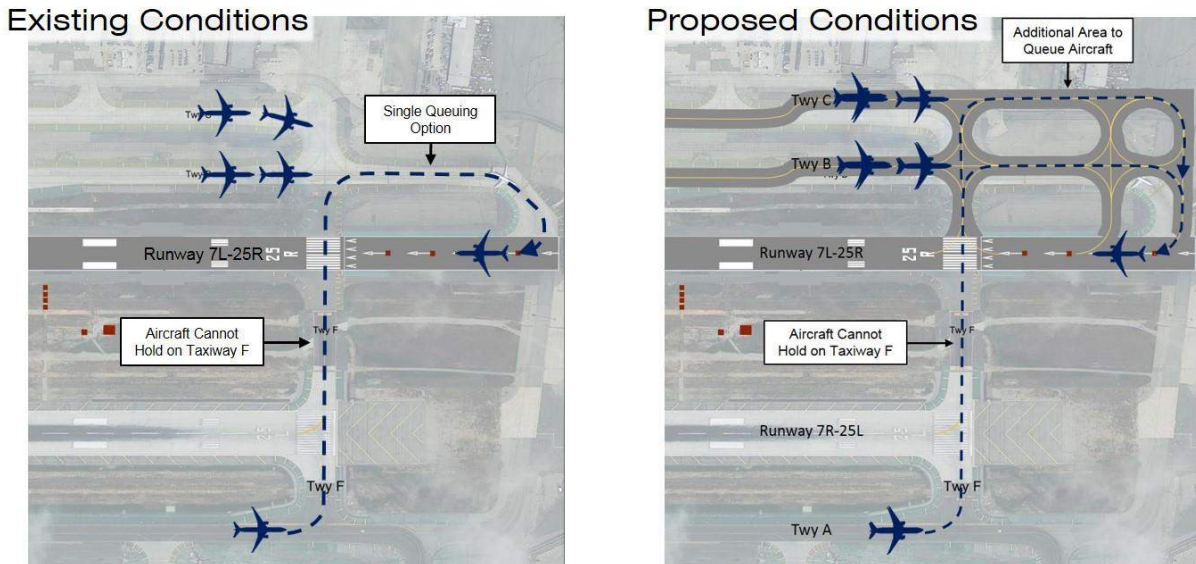
Source: RS&H, 2015

#### Taxiway C Extension Concept

Extending Taxiway C (illustrated in *Figure 4-5*) may further reduce Runway 25L departures by enhancing the flexibility for Runway 25R departures. The 2014 PRUP Report cites that the location of air cargo facilities and fixed-base operators contribute to the lower PRUP compliance for the South Airfield. Runway 7R-25L is proximate to the facilities south of the South Airfield making it an attractive option for departures.

Challenging access for departures to Runway 25R from Taxiway A discourages Runway 25R departures. Aircraft taxiing from the facilities south of the South Airfield must enter the departure queue on Taxiway B after crossing both runways. Aircraft generally cannot hold on Taxiway F between the runways because of insufficient lateral runway separation and the presence of protected areas (Precision Obstacle Free Zone and Instrument Landing System critical area). Therefore, space must be available within the departure queue on Taxiway B before an aircraft can cross the runways. ATC instructs aircraft on Taxiway A to cross when they are first, second, or third in line for departure. Aircraft cannot cross when they are fourth or later in line for departure because there is inadequate space to accommodate the aircraft in the departure queue on Taxiway B. This challenging procedure requires careful coordination with the departure queue and departing and arriving aircraft.

**FIGURE 4-5:  
TAXIWAY C EXTENSION**



Source: RS&H, 2015

Extending Taxiway C would enhance access to Runway 25R from Taxiway A resulting in increased attractiveness of departing Runway 25R in lieu of Runway 25L. The Taxiway C extension would result in greater ATC flexibility for staging aircraft for Runway 25R departure. The additional staging area on Taxiway C may minimize the amount of time aircraft must idle on Taxiway A while waiting to cross the runways. The Taxiway C extension would provide bidirectional flow redundancy to the runway end and the B1 parking apron. The extension could be constructed to facilitate direction reversals between the parallel taxiways. Bidirectional flow would allow aircraft to remain in the departure queue without having to unnecessarily taxi down the runway if they are not ready for departure, which may result in air quality benefits. This project would result in an overall increased efficiency that supports the PRUP. The Taxiway C extension would enhance ATC's ability to bring aircraft from Taxiway A to depart Runway 25R. ATC expressed their support for the Taxiway C extension on numerous occasions noting that it would improve their ability to efficiently manage departures and would ease access to Runway 25R from Taxiway A. The improved Runway 25R departure queue efficiency may allow ATC to divert more departures from Runway 25L to Runway 25R. The following benefits are associated with the Taxiway C extension:

- » Larger queue area to stage for Runway 25R
- » Enhances ATC flexibility to cross aircraft from Taxiway A to queue for Runway 25R departure which may reduce aircraft idle time on Taxiway A
- » Potentially reduces Runway 25L departures
- » Bidirectional flow enhances access to the B1 aircraft parking apron even when aircraft are queued for departure
- » May reduce unnecessary taxiing to reenter departure queue which may benefit air quality

- » Supported by FAA ATC

## General Aviation Concepts

General aviation PRUP adherence rates in the South Airfield were as low as 66 percent between 2010 and 2013, based on the 2014 PRUP Report. General aviation pilots typically are not as familiar with the airfield geometry and airport operations compared to passenger and air cargo pilots who regularly fly scheduled service to LAX. Therefore, FAA ATC often instructs general aviation pilots to depart Runway 25L because it is the closest runway to the general aviation facilities. The shorter taxi distance facilitates the safety and operational efficiency of the Airport.

Several concepts were prepared to increase the general aviation PRUP adherence rates and minimize Runway 7R-25L departures. Recommended concepts include update of the FAA Airport/Facility Directory noise mitigation remarks to include the PRUP instructions. The Airport/Facility Directory already includes information regarding early turns but does not currently include PRUP information. This update may encourage general aviation pilots to request Runway 7L-25R for departure more frequently.

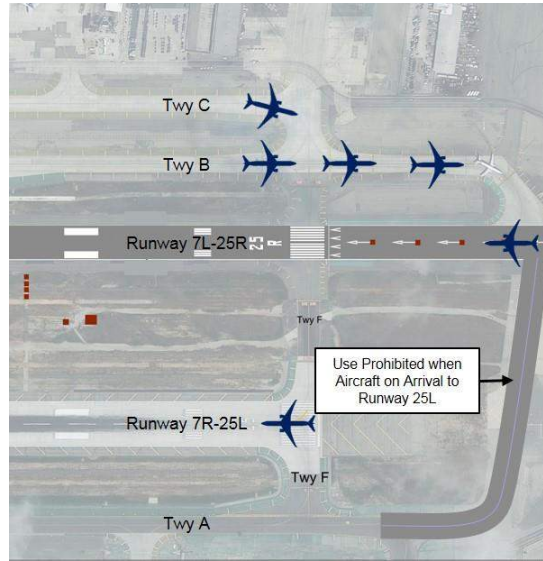
General aviation adherence may also be increased by actively engaging pilots. Distribution of PRUP materials in fixed-base operator flight planning rooms may increase pilot awareness. Distribution of airfield learning materials may also increase pilot familiarization with the Airport operations. These efforts may increase FAA ATC willingness to assign general aviation aircraft to Runway 7L-25R for departure.

## Taxiway A Bypass Concept Not Feasible

A Taxiway A bypass was explored to assess the effectiveness on minimizing Runway 25R departures. It was determined that a Taxiway A bypass, as depicted in *Figure 4-6*, is not feasible because it does not meet FAA airfield design standards for an End-Around Taxiway.<sup>10</sup> The centerline of an End-Around Taxiway must be a minimum of 1,500 feet from the stop end of the runway. There is insufficient space east the runway ends to construct a standard End-Around Taxiway. Additionally, use of the Taxiway A bypass aircraft would be prohibited when aircraft are on approach to Runway 25L. The analysis determined that the Taxiway A bypass may be used to taxi and queue aircraft from Taxiway B to depart Runway 25L. This is an unintended consequence, which conflicts with noise reduction efforts.

<sup>10</sup> FAA Advisory Circular 150/5300-13A, Airport Design, Para. 415

**FIGURE 4-6:  
TAXIWAY A BYPASS**



Source: RS&H, 2015.

# **EXHIBIT**

# **15**

# LAX Terminal 9

## NASIP Update

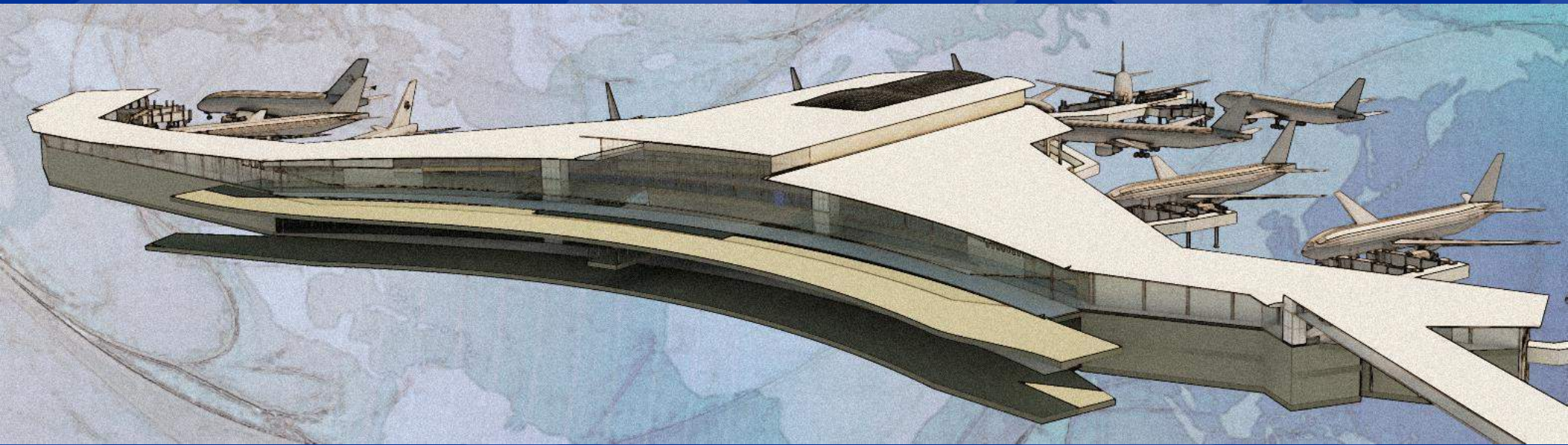
June 14, 2018



# Agenda

- Current T9 Concept
- Program Schedule
- Airfield

# Terminal Concept Plans



## Developments since December

- Building shape adjusted to consolidate around central access
  - Better alignment of departures curb and ticketing
  - Central screening checkpoint and concessions
  - More holdroom space at highest density gate area
- Incorporated all United stakeholder feedback
- LAWA workshops to review Program Definition Book
  - Draft PDB issued to LAWA on May 7

Revised Concept

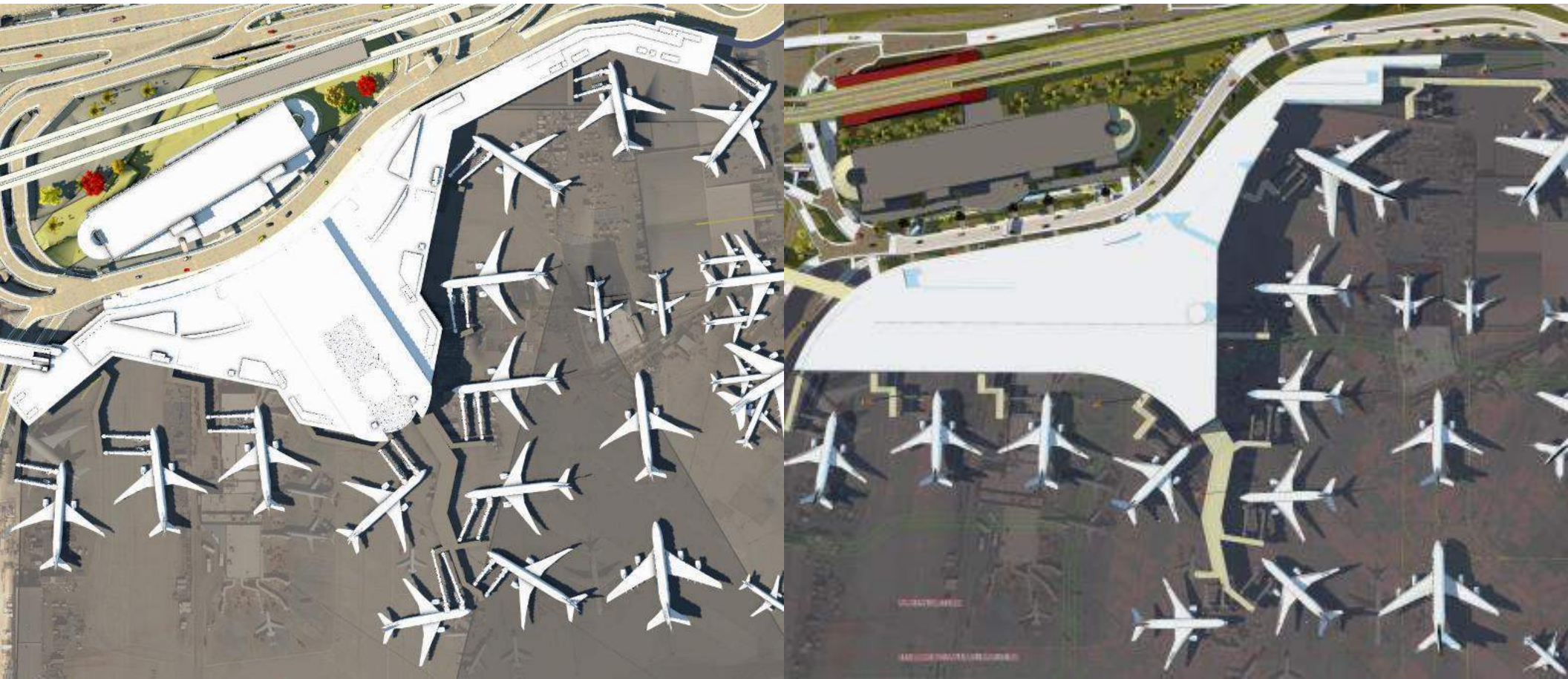


East Aircraft  
Maintenance

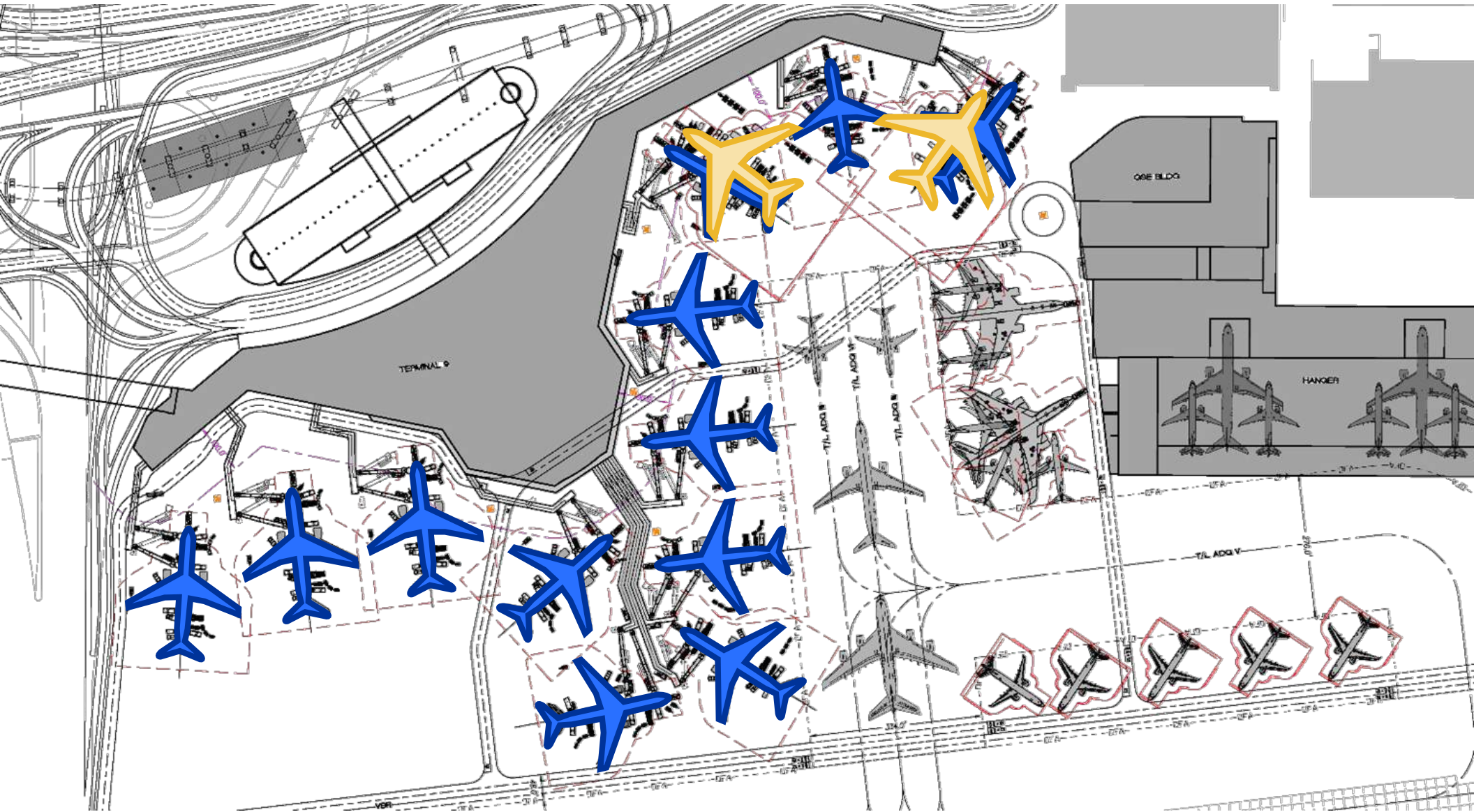


# Revised Concept

# Original Concept



# Widebody Gates 9 ADG-2VAD-6ADG-VI



# Narrowbody Gates

# 18 ADG-III





# Five Level Terminal

ATMP-AL010

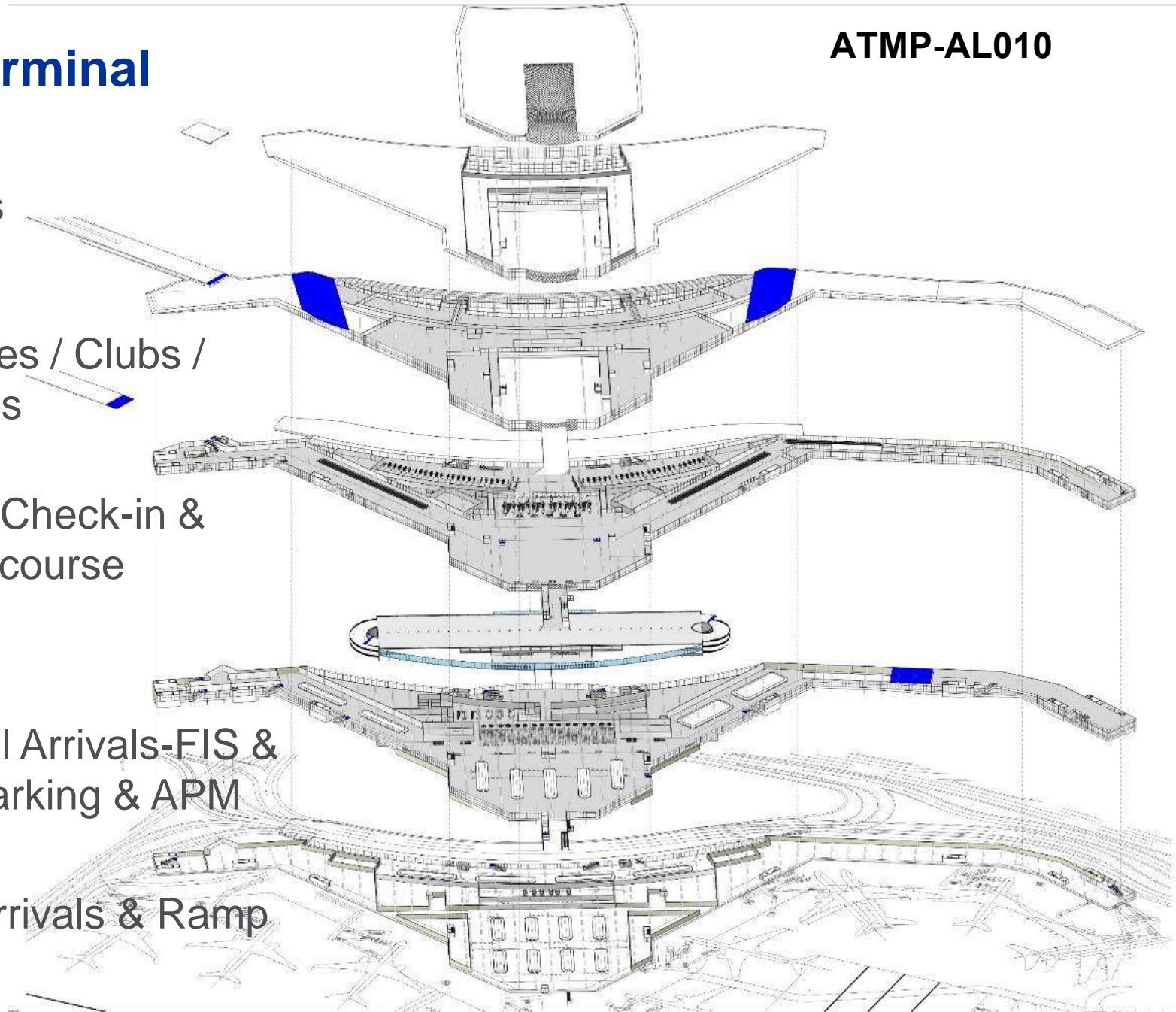
Level 5 MEP Rooms

Level 4 Airline Offices / Clubs /  
Concessions

Level 3 Departures Check-in &  
Airside Concourse

Level 2 International Arrivals-FIS &  
Bridge to Parking & APM

Level 1 Domestic Arrivals & Ramp  
Operations



## Preliminary Building Floor Area Calculations

| FUNCTION                    | Floor Area SF    |
|-----------------------------|------------------|
| Air Clubs & Lounges         | 57,680           |
| Baggage Handling            | 122,540          |
| Check-in Hall               | 33,720           |
| Circulation                 | 234,220          |
| Concessions                 | 77,390           |
| FIS/Sterile Corridors       | 260,490          |
| Gate Holdroom Lounges       | 75,940           |
| MEP Rooms                   | 66,790           |
| Offices                     | 88,280           |
| Restrooms, Service, Storage | 46,410           |
| TSA Security Checkpoint     | 27,470           |
| TSA CBIS/CBRA & Support     | 18,330           |
| <b>TOTAL</b>                | <b>1,109,260</b> |

| LEVEL  | Floor Area SF    |
|--|------------------|
| Level 1 Arrivals                             | 232,020          |
| Level 2 International Arrivals & FIS         | 330,210          |
| Level 3 Departures & Concourse               | 319,700          |
| Level 4 Airline Offices & Clubs, Concessions | 190,230          |
| Level 5 MEP Rooms                            | 37,100           |
| <b>TOTAL</b>                                 | <b>1,109,260</b> |

## Terminal Issues to be Investigated



- Review stacking of the building for alternatives
  - FIS on top floor
- Passport first instead of bag first
- Bridge connection to APM – vertical transition in terminal or in station
- Terminal 7/8 vertical core connection to Terminal 9 bridge
- Overall passenger flow review

## T9 Parking Garage

- Road phasing impacts garage
- Integration with APM Station allows for initial garage to be viable
- If stand alone, garage isn't viable until roads are complete

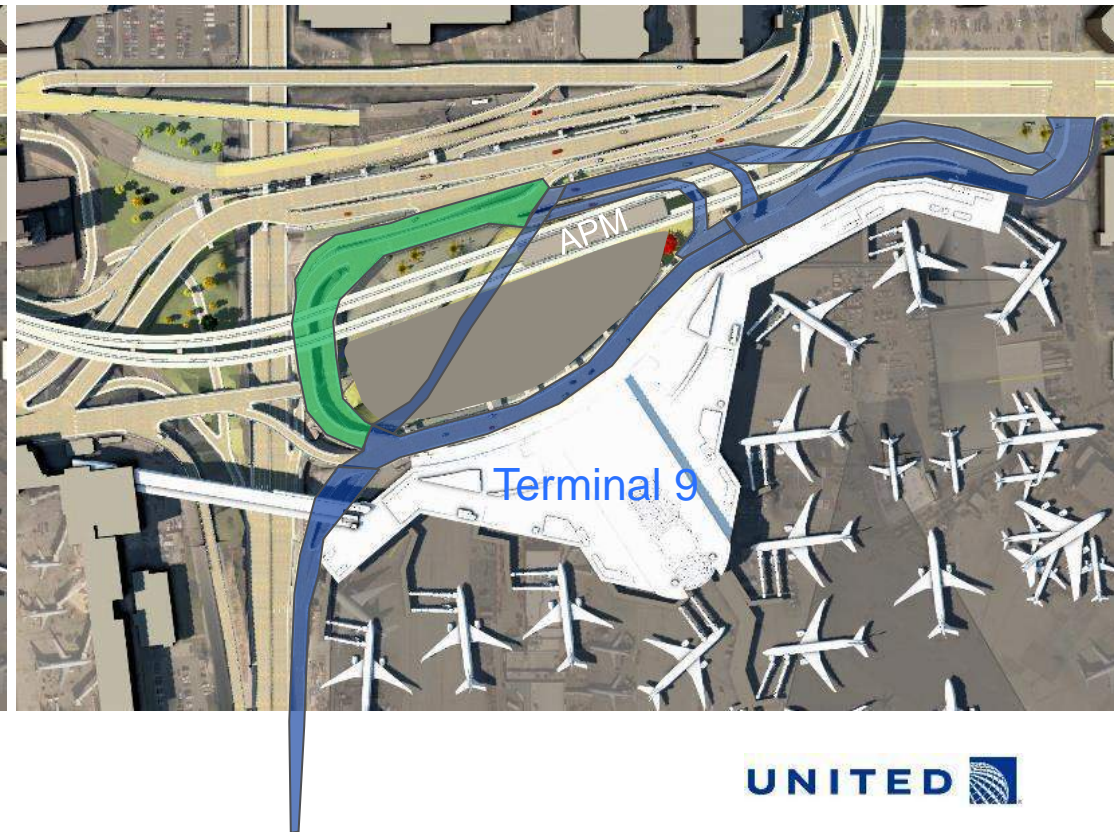
### APM Phased Option

1500-2100 spaces

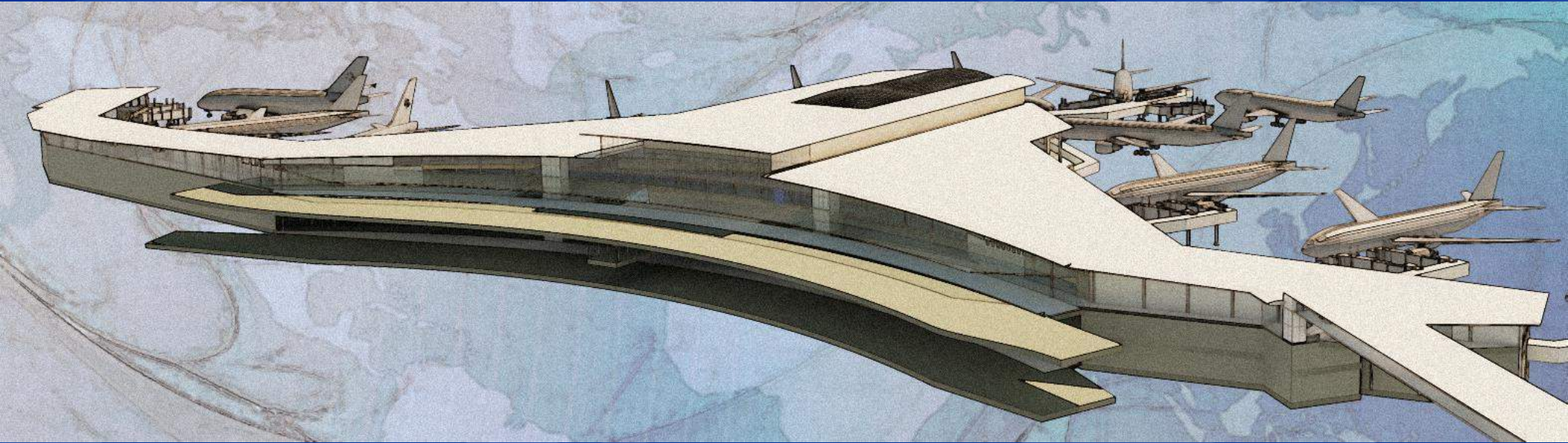


### Stand Alone Option

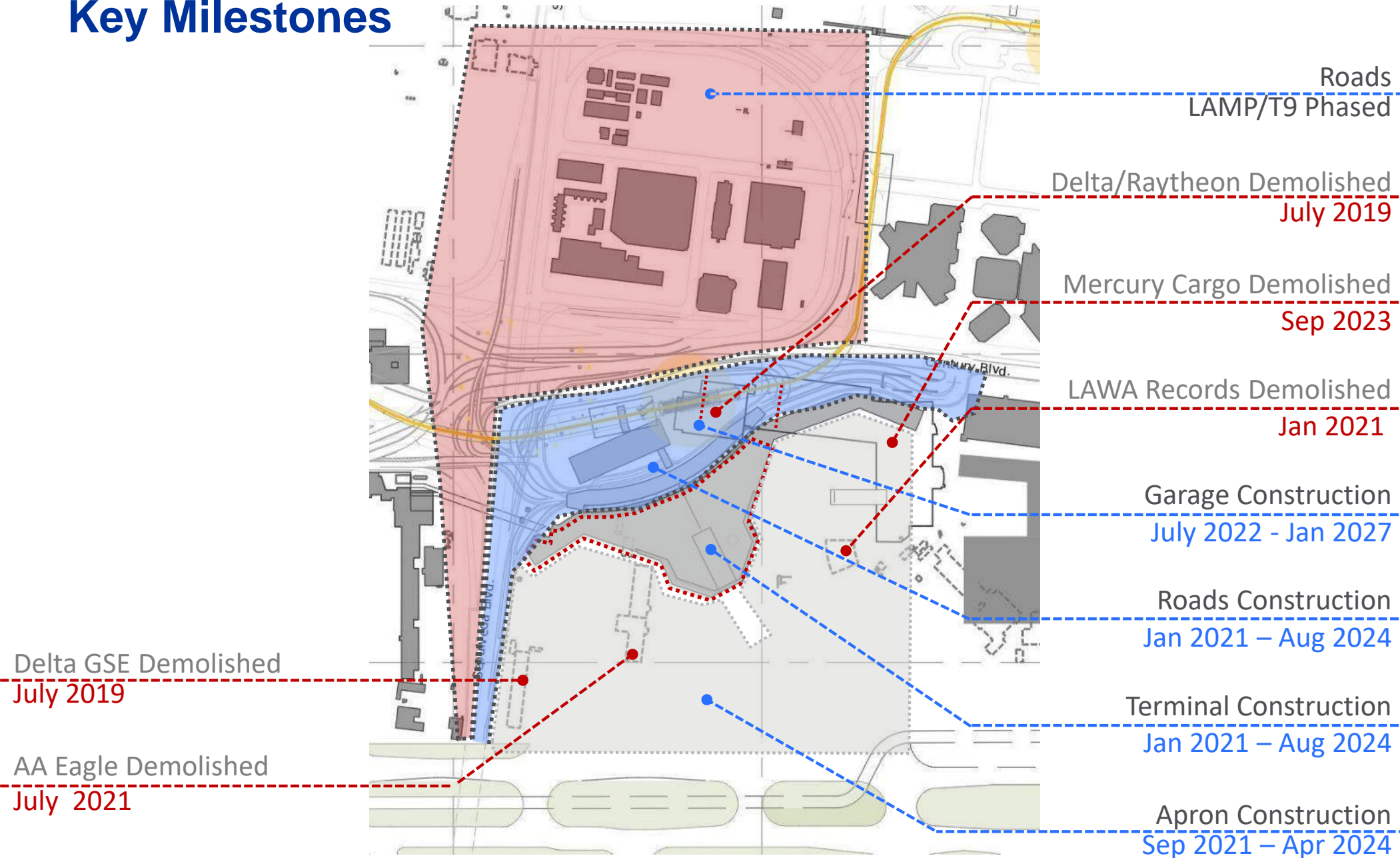
1000 spaces



# Program Schedule



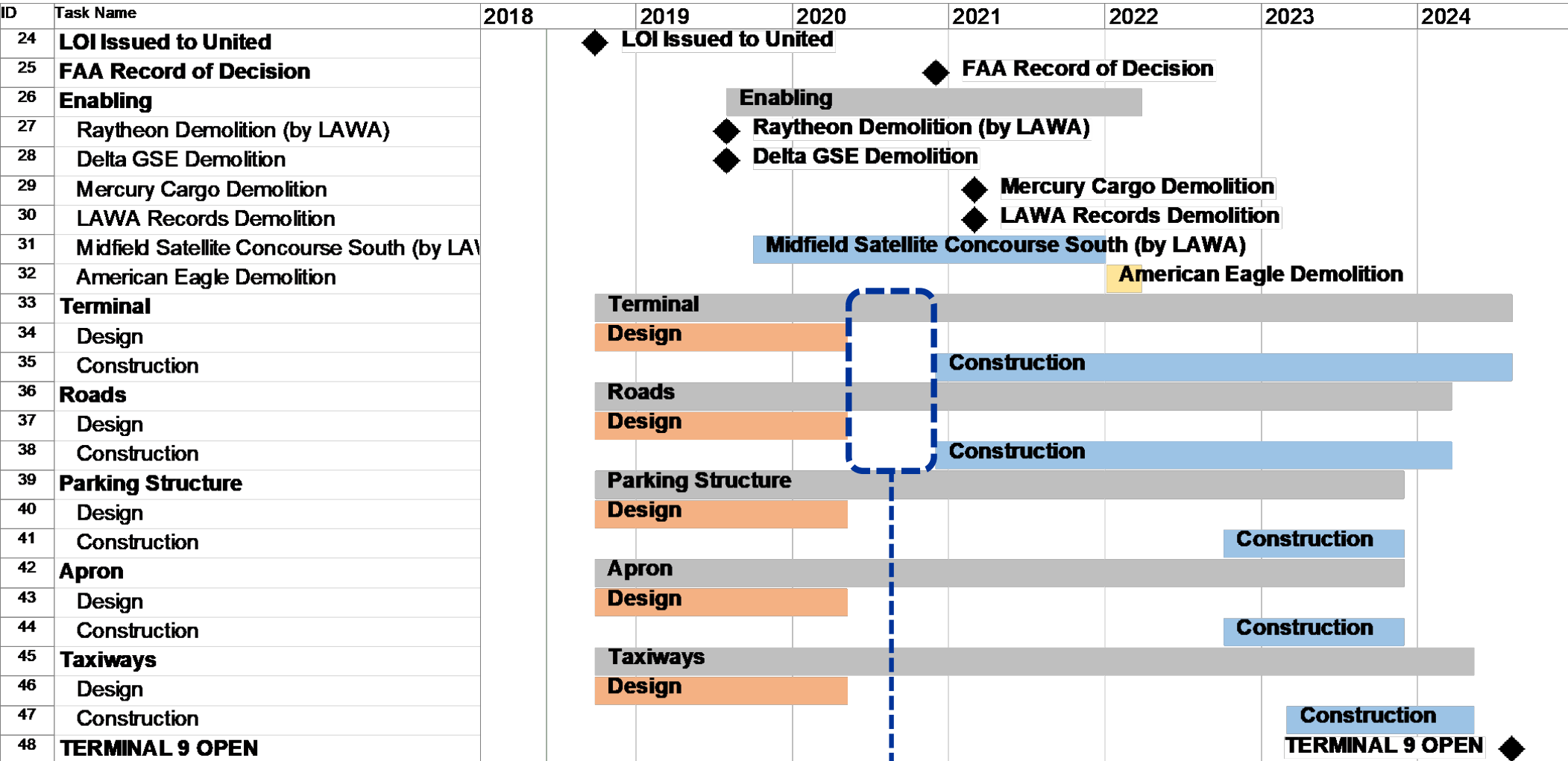
# Key Milestones



# Management Schedule

| ID | Task Name                               | Start          | Finish         | 2019                                      |    |    |    | 2020 |
|----|---|----------------|----------------|---|----|----|----|------|
|    |   |                |                | Q2  | Q3 | Q4 | Q1 | Q2   |
| 1  | <b>PDB</b>                              | <b>5/7/18</b>  | <b>9/14/18</b> | PDB                                       |    |    |    |      |
| 2  | Draft PDB Issued to LAWA                | 5/7/18         | 5/7/18         | ◆ Draft PDB Issued to LAWA                |    |    |    |      |
| 3  | Terminal Refinement                     | 5/7/18         | 7/27/18        | Terminal Refinement                       |    |    |    |      |
| 4  | Final Draft PDB Issued to LAWA          | 8/3/18         | 8/3/18         | ◆ Final Draft PDB Issued to LAWA          |    |    |    |      |
| 5  | LAWA Comments Due                       | 8/24/18        | 8/24/18        | ◆ LAWA Comments Due                       |    |    |    |      |
| 6  | LAWA Comment Resolution Session         | 8/31/18        | 8/31/18        | ◆ LAWA Comment Resolution Session         |    |    |    |      |
| 7  | Final PDB Production                    | 9/3/18         | 9/14/18        | Final PDB Production                      |    |    |    |      |
| 8  | Final PDB Issued                        | 9/14/18        | 9/14/18        | ◆ Final PDB Issued                        |    |    |    |      |
| 9  | <b>Letter of Intent</b>                 | <b>7/11/18</b> | <b>9/26/18</b> | Letter of Intent                          |    |    |    |      |
| 10 | Key Terms Discussions                   | 7/11/18        | 8/7/18         | Key Terms Discussions                     |    |    |    |      |
| 11 | Draft Term Sheet                        | 8/7/18         | 8/7/18         | ◆ Draft Term Sheet                        |    |    |    |      |
| 12 | United Term Sheet Review                | 8/8/18         | 8/21/18        | United Term Sheet Review                  |    |    |    |      |
| 13 | Term Sheet Issue Resolution             | 8/22/18        | 8/28/18        | Term Sheet Issue Resolution               |    |    |    |      |
| 14 | Final Term Sheet                        | 8/28/18        | 8/28/18        | ◆ Final Term Sheet                        |    |    |    |      |
| 15 | Board of Airport Commissioners Approval | 9/20/18        | 9/20/18        | ◆ Board of Airport Commissioners Approval |    |    |    |      |
| 16 | LOI Issued to United                    | 9/26/18        | 9/26/18        | ◆ LOI Issued to United                    |    |    |    |      |
| 17 | <b>Lease</b>                            | <b>9/27/18</b> | <b>6/5/19</b>  | Lease                                     |    |    |    |      |
| 18 | First Draft                             | 9/27/18        | 11/7/18        | First Draft                               |    |    |    |      |
| 19 | Additional Drafts and Reviews           | 11/8/18        | 3/13/19        | Additional Drafts and Reviews             |    |    |    |      |
| 20 | Final Lease for Execution               | 3/13/19        | 3/13/19        | ◆ Final Lease for Execution               |    |    |    |      |
| 21 | Board of Airport Commissioners Approval | 4/10/19        | 4/10/19        | BOAC Approval ◆                           |    |    |    |      |
| 22 | City Council Approval                   | 5/22/19        | 5/22/19        | ◆ City Council Approval                   |    |    |    |      |
| 23 | Lease Executed                          | 6/5/19         | 6/5/19         | ◆ Lease Executed                          |    |    |    |      |

# Design and Construction Schedule



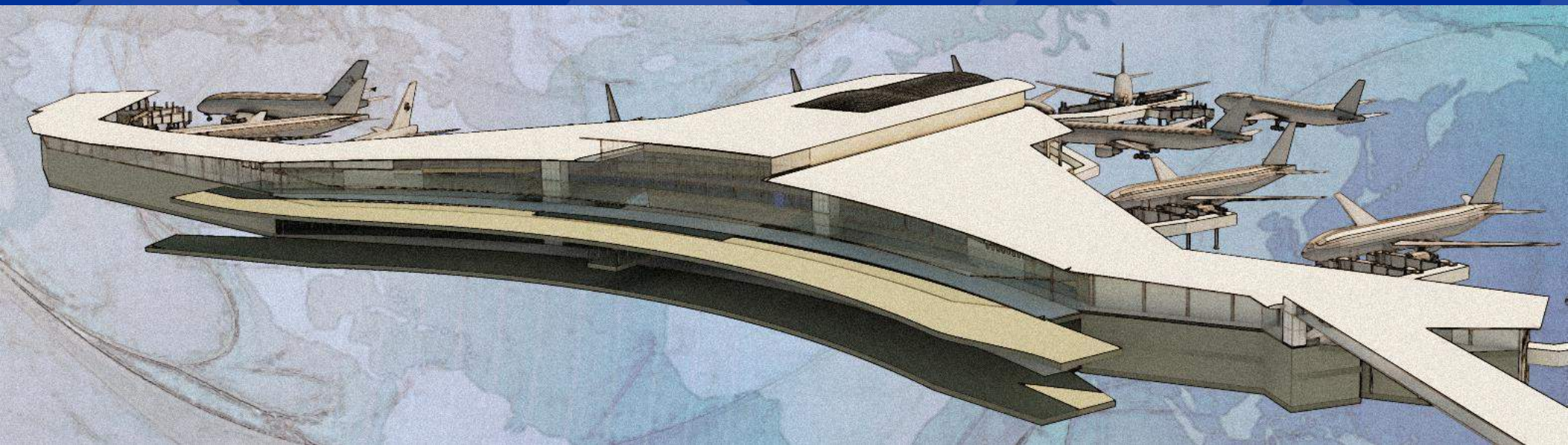
6 Months of Float



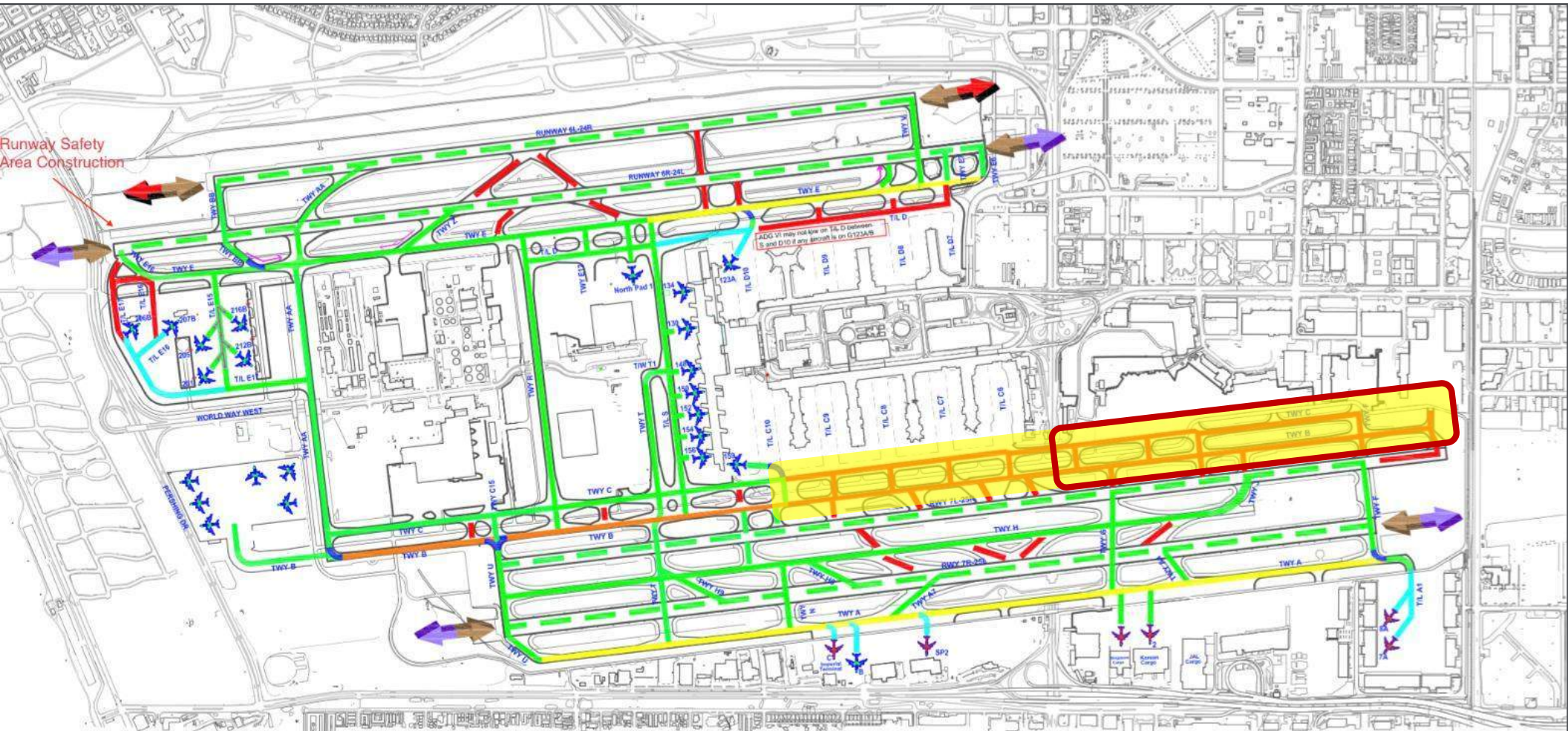
## Critical Schedule Issues

- Completion of Business Deal
  
- American Eagle Relocation
  - LAWA initiating design through an existing contract
  - Need to start construction on MSC-South before MSC-North completes
  
- Cargo Relocation
  - LAWA process will not meet the schedule
  - United can address half the requirement
  - LAWA recently indicated they have a solution for the other half

# Airfield

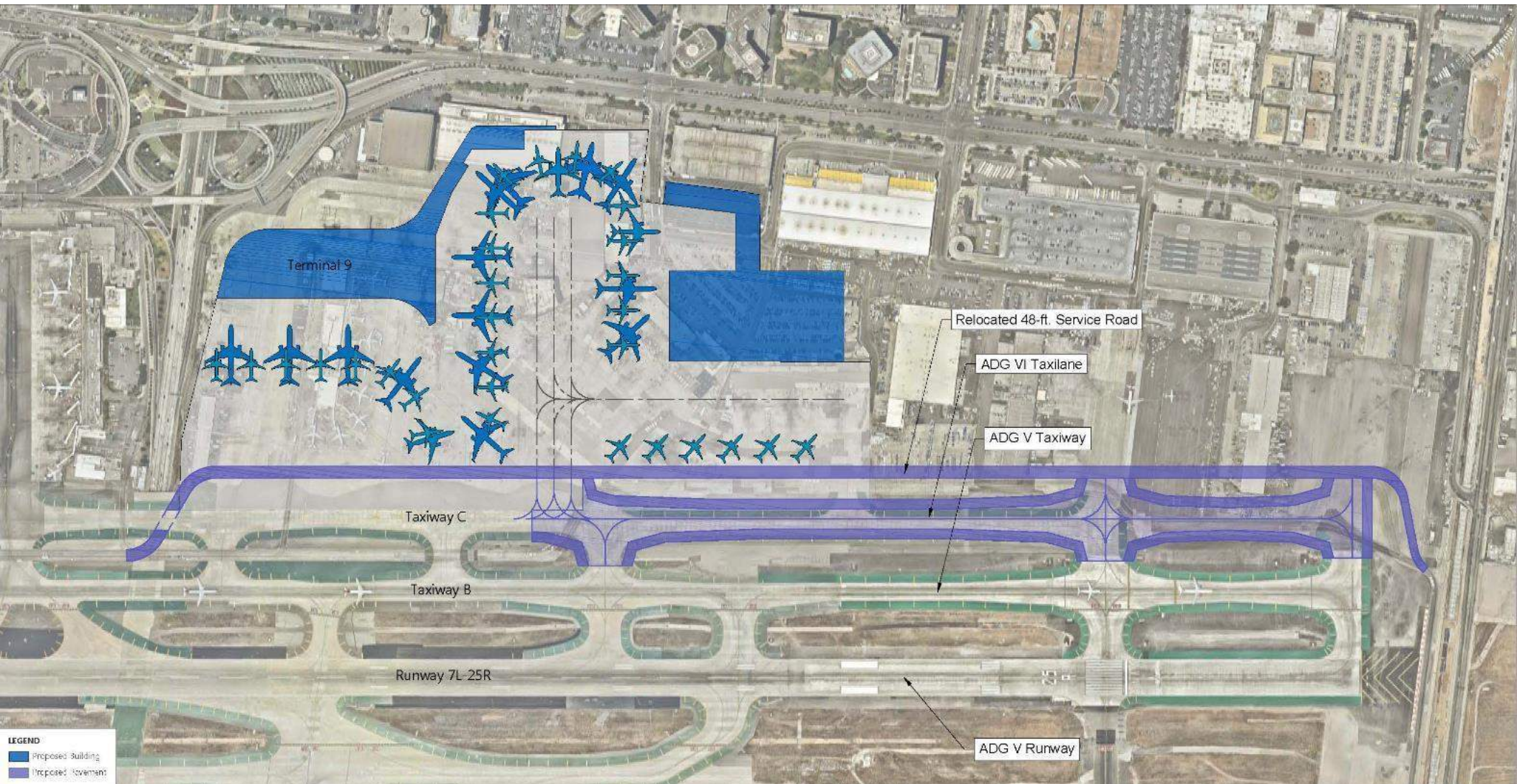


# A380 Movements Restricted in South Airfield

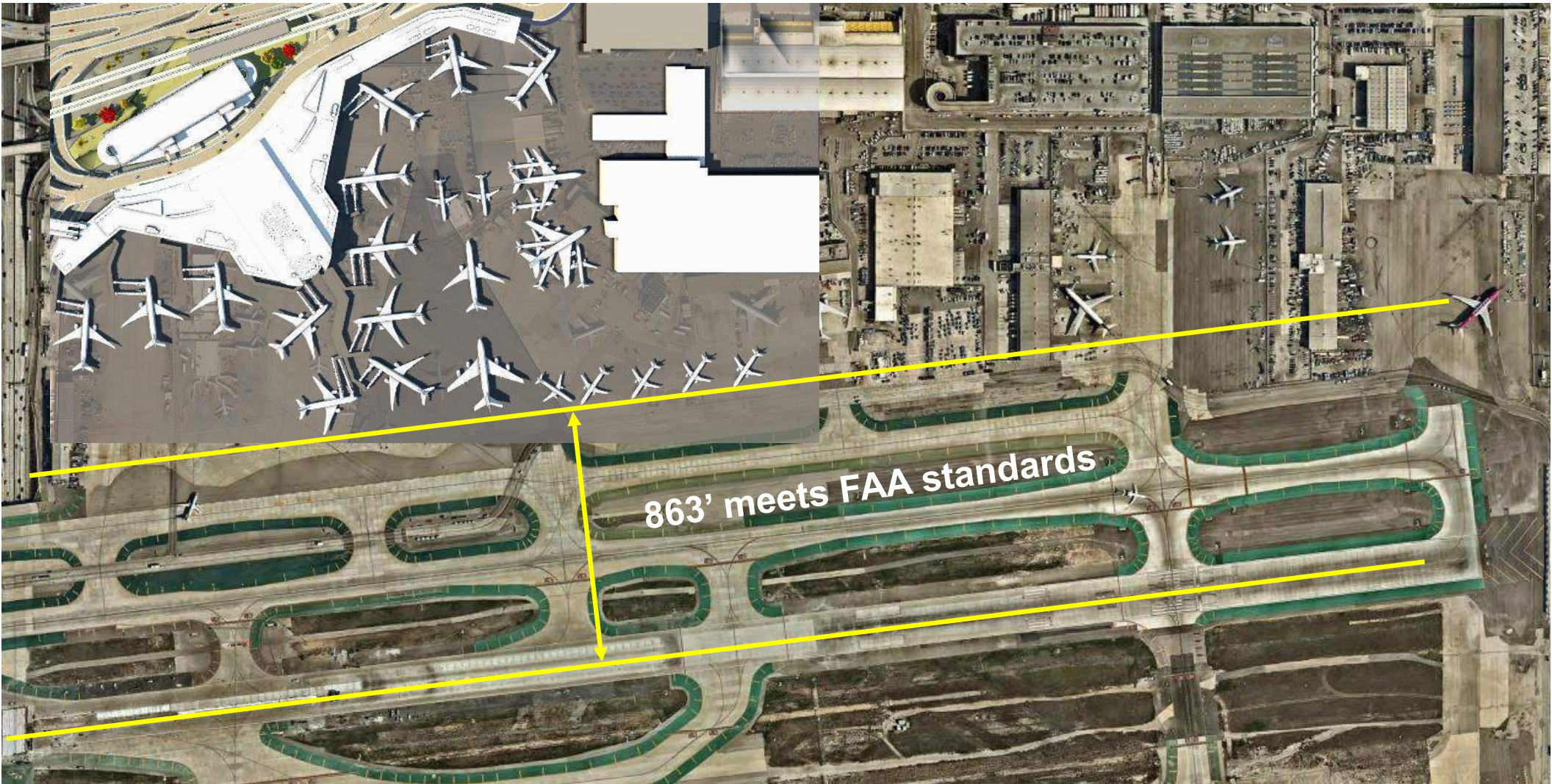


# Airfield Configuration 1C Allows A380 movement at T9

## 863' RW 7L/25R to VSR

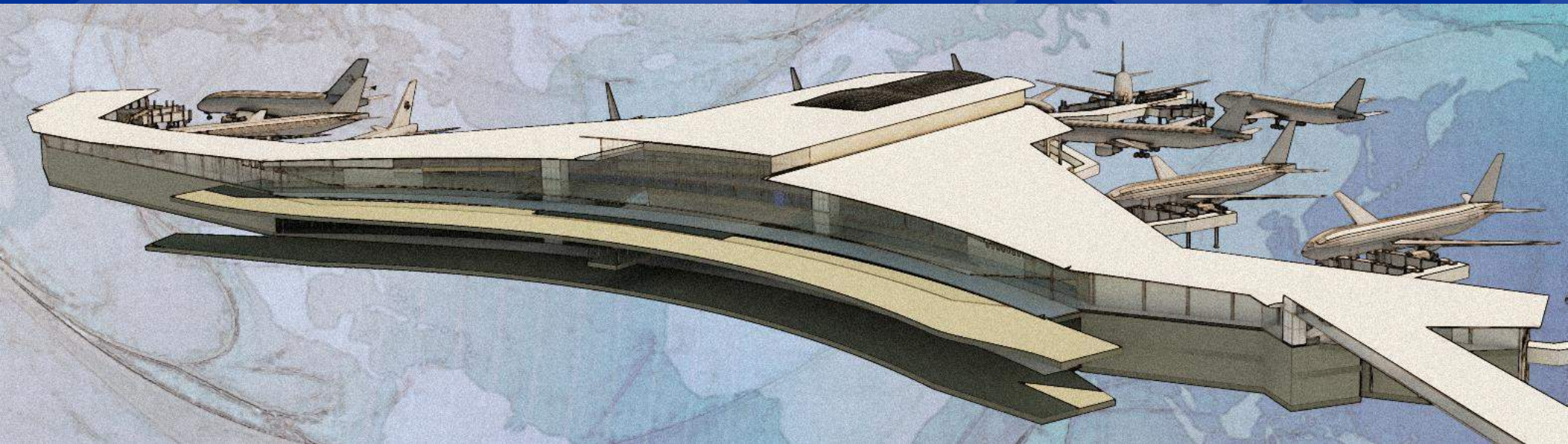


**Separation from RW 7L-25 to be increased 773' to 863'**  
**Allows for A380 movements at T9**



# Separation at 786' allows for A380 full length of B Increases RON potential





# **EXHIBIT**

# **16**





# City of El Segundo

## Office of the City Manager

October 18, 2018

[VIA U.S. MAIL AND E-MAIL]

**Elected Officials:**

*Drew Boyles,*  
Mayor  
*Carol Firsirotu,*  
Mayor Pro Tem  
*Dr. Don Braun,*  
Council Member  
*Chris Pimentel,*  
Council Member  
*Scot Nicol,*  
Council Member  
*Tracy Weaver,*  
City Clerk  
*Crista Binder,*  
City Treasurer

**Appointed Officials:**

*Greg Carpenter,*  
City Manager  
*Mark D. Hensley,*  
City Attorney

**Department Directors:**

*Joseph Lillio,*  
Finance  
*Acting Human Resources*  
*Chris Donovan,*  
Fire Chief  
*Charles Mallory,*  
Information Systems  
*Melissa McCollum,*  
Library Services  
*Sam Lee,*  
Planning and  
Building Safety  
*Bill Whalen,*  
Police Chief  
*Ken Berkman,*  
Public Works  
*Meredith Pettit,*  
Recreation & Parks

Deborah Flint  
Chief Executive Officer  
1 World Way  
Los Angeles, California 90045

**Subject: El Segundo RSI Program**

Dear Ms. Flint,

On July 17, 2018, the El Segundo City Council directed staff to terminate the City's Residential Sound Insulation (RSI) program and to work with Los Angeles World Airport (LAWA) on a process to transfer the RSI program to LAWA.

While the City has successfully insulated thousands of homes to reduce the noise impacts from LAX airport, there are still hundreds of eligible homes that have not been treated.

The City requests LAWA advise the City as to its plans to treat the remaining eligible homes. The City stands ready to assist to ensure a smooth transition. Please contact either myself at (310) 524-2301 or Director Sam Lee at (310) 524-2345 to discuss further.

Sincerely,

Greg Carpenter  
City Manager

cc:

Mayor and Members of the City Council  
Samantha Bricker, Deputy Executive Director  
Sam Lee, Director of Planning and Building Safety

[www.elsegundo.org](http://www.elsegundo.org)  
[www.elsegundobusiness.com](http://www.elsegundobusiness.com)  
[www.elsegundo100.org](http://www.elsegundo100.org)

**Lee, Sam**

---

**From:** Lee, Sam  
**Sent:** Friday, September 21, 2018 2:56 PM  
**To:** 'OKUDA, KENDRICK'  
**Subject:** El Segundo RSI program  
**Attachments:** RSI press release 2018.pdf

Kendrick,

Attached is a press release describing termination of El Segundo's RSI program back in July 2018. There are few follow up items we'd like to discuss with you. Please provide available time/dates when you're available to meet in the next few weeks.

Thank you,

Sam Lee  
Director of Planning and Building Safety  
City of El Segundo  
310-524-2345

FOR IMMEDIATE RELEASE

## **City of El Segundo Moves to End City-run Residential Sound Insulation Program**

*City looks forward to working with Los Angeles World Airports on a smooth transition to serve eligible El Segundo homeowners*

EL SEGUNDO, California – July 19, 2018 -- The City of El Segundo today announced that the City Council has directed the city manager to work with Los Angeles World Airports (LAWA) on a process to transfer its Residential Sound Insulation (RSI) Program to LAWA so that those homeowners eligible under the current rules may have their homes sound insulated against noise from LAX. The airport, one of the world's busiest, is located immediately north of El Segundo's city limits, with the closest runway mere hundreds of feet from El Segundo residents.

"While the city has successfully insulated thousands of homes to reduce the impacts of LAX noise, changes in the way that the Federal Aviation Administrator is regulating the sound insulation program means that it is not a good use of city resources to continue the program," said Drew Boyles, the mayor of the city of El Segundo. "With today's announcement, we look forward to working with Los Angeles World Airports on transitioning the program to them so that eligible homeowners can have their homes better insulated against noise from LAX."

Since the inception of the Program in the mid-1980s, the City has sound insulated around two thousand homes. The funds for RSI come from the FAA and LAWA. The funds provide for basic upgrades to doors, windows and similar improvements.

When the Program started, El Segundo was able to implement a program that used these FAA and LAWA monies but allowed homeowners to pay, with their own funds, for upgrades (for example, more attractive doors and windows) to what the basic RSI program would pay for. El Segundo managed this process.

However, in recent years, FAA has decided that such owner upgrades were not permissible under federal regulations. Further, the FAA has required burdensome changes to El Segundo's contracting requirements before the City could continue the program. In addition, a recent rule provided that in order to be eligible, a home needs to be within a high-noise area and also that testing of the inside noise levels demonstrate that noise levels are high enough that the insulating will improve those levels.

Given these rules changes and others, the City Council determined that the City's management of the RSI Program did not provide good value for the resources expended and that LAWA, with its greater resources, would be better positioned to implement the new more basic RSI Program.

LAWA has insulated thousands of homes north of LAX, and transitioning the El Segundo program to LAWA will provide El Segundo residents access to these improvements as quickly as possible.

# **EXHIBIT**

# **17**



# City of El Segundo

## Office of the City Manager

November 14, 2018

[VIA U.S. MAIL AND E-MAIL]

**Elected Officials:**

*Drew Bayles,*  
Mayor  
*Carol Pirstuk,*  
Mayor Pro Tem  
*Dr. Don Brann,*  
Council Member  
*Chris Pimentel,*  
Council Member  
*Scott Nicol,*  
Council Member  
*Tracy Weaver,*  
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*Charles Mallory,*  
Information Systems  
*Melissa McCollum,*  
Library Services  
*Sam Lee,*  
Planning and  
Building Safety  
*Bill Whalen,*  
Police Chief  
*Ken Berkman,*  
Public Works  
*Meredith Pettit,*  
Recreation & Parks

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[www.elsegundobusiness.com](http://www.elsegundobusiness.com)  
[www.elsegundo100.org](http://www.elsegundo100.org)

Dave Cushing  
Manager  
Federal Aviation Administration  
Western-Pacific Region Airports Division  
777 S Aviation Blvd, Ste 150  
El Segundo, California 90245

**Subject: El Segundo RSI Program**

Dear Mr. Cushing,

On July 17, 2018, the El Segundo City Council directed staff to terminate the City's Residential Sound Insulation (RSI) program and to work with Los Angeles World Airport (LAWA) on a process to transfer the RSI program to LAWA.

While the City has successfully insulated thousands of homes to reduce the noise impacts from LAX airport, there are still hundreds of eligible homes that have not been treated.

Please contact either me at (310) 524-2301 or Director Sam Lee at (310) 524-2345 to discuss further.

Sincerely,

  
Greg Carpenter  
City Manager

cc:  
Mayor and Members of the City Council  
Al Richardson, Assistant Manager  
Mark Hensley, City Attorney  
Sam Lee, Director of Planning and Building Safety

**Lee, Sam**

---

**From:** Lee, Sam  
**Sent:** Friday, September 21, 2018 2:54 PM  
**To:** 'dave.cushing@faa.gov'  
**Subject:** El Segundo RSI program  
**Attachments:** RSI press release 2018.pdf

Dave,

Attached is a press release describing termination of El Segundo's RSI program back in July 2018. There are few follow up items we'd like to discuss with you. Please provide available time/dates when you're available to meet. In the next few weeks.

Thank you,

Sam Lee  
Director of Planning and Building Safety  
City of El Segundo  
310-524-2345

FOR IMMEDIATE RELEASE

## **City of El Segundo Moves to End City-run Residential Sound Insulation Program**

*City looks forward to working with Los Angeles World Airports on a smooth transition to serve eligible El Segundo homeowners*

EL SEGUNDO, California – July 19, 2018 -- The City of El Segundo today announced that the City Council has directed the city manager to work with Los Angeles World Airports (LAWA) on a process to transfer its Residential Sound Insulation (RSI) Program to LAWA so that those homeowners eligible under the current rules may have their homes sound insulated against noise from LAX. The airport, one of the world's busiest, is located immediately north of El Segundo's city limits, with the closest runway mere hundreds of feet from El Segundo residents.

"While the city has successfully insulated thousands of homes to reduce the impacts of LAX noise, changes in the way that the Federal Aviation Administrator is regulating the sound insulation program means that it is not a good use of city resources to continue the program," said Drew Boyles, the mayor of the city of El Segundo. "With today's announcement, we look forward to working with Los Angeles World Airports on transitioning the program to them so that eligible homeowners can have their homes better insulated against noise from LAX."

Since the inception of the Program in the mid-1980s, the City has sound insulated around two thousand homes. The funds for RSI come from the FAA and LAWA. The funds provide for basic upgrades to doors, windows and similar improvements.

When the Program started, El Segundo was able to implement a program that used these FAA and LAWA monies but allowed homeowners to pay, with their own funds, for upgrades (for example, more attractive doors and windows) to what the basic RSI program would pay for. El Segundo managed this process.

However, in recent years, FAA has decided that such owner upgrades were not permissible under federal regulations. Further, the FAA has required burdensome changes to El Segundo's contracting requirements before the City could continue the program. In addition, a recent rule provided that in order to be eligible, a home needs to be within a high-noise area and also that testing of the inside noise levels demonstrate that noise levels are high enough that the insulating will improve those levels.

Given these rules changes and others, the City Council determined that the City's management of the RSI Program did not provide good value for the resources expended and that LAWA, with its greater resources, would be better positioned to implement the new more basic RSI Program.

LAWA has insulated thousands of homes north of LAX, and transitioning the El Segundo program to LAWA will provide El Segundo residents access to these improvements as quickly as possible.

# **EXHIBIT**

# **18**





# City of El Segundo

## Office of the City Manager

September 18, 2020

*Via E-Mail and U.S. Mail*

Samantha Bricker  
Chief Environmental and Sustainability Officer  
Los Angeles World Airports  
1 World Way  
Los Angeles CA 90045  
E-Mail: [sbricker@lawa.org](mailto:sbricker@lawa.org)

**RE: LAWA Compliance with 2020 Stipulated Variance for LAX**

Dear Ms. Bricker:

On behalf of the City of El Segundo, I am writing to following up on efforts underway at Los Angeles World Airports ("LAWA") to comply with the 2020 Variance granted by CALTRANS to LAX. I have enclosed a copy for your ease of reference.

As noted in paragraph 2 of the Variance, LAWA is required to continue to implement its Aircraft Noise Mitigation Program ("ANMP"). The Variance also makes clear that in light of the City of El Segundo's decision to end its operation of a Residential Sound Insulation ("RSI") Program within its municipal boundaries, LAWA is responsible for implementing the ANMP for eligible El Segundo residences. LAWA's current ANMP contemplates and relies on RSI for eligible El Segundo residences. RSI is also an integral part of LAWA's Master Plan Mitigation Monitoring and Reporting Plan ("MMRP").

At your earliest convenience, please provide me with an update regarding the steps LAWA is taking to start its own RSI Program in El Segundo. The City of El Segundo is eager to cooperate and share information with LAWA as part of that effort. Specifically, we would like to understand what LAWA has already done as well as anticipated next steps, funding levels, and timeline/milestones. It is important that LAWA start this RSI Program in El Segundo promptly in order to demonstrate best efforts and meet the requirements of the Variance.

Additionally, I note that the Variance requires LAWA to timely provide specific information to the public in Quarterly Noise Reports. The last Quarterly Noise Report released by LAWA for LAX covered the third quarter of 2019. We are now nine months into 2020 and have yet to see a report for the last quarter of 2019 or any quarters of 2020. In other words, LAWA is not meeting the deadline of "45 days after the end of the calendar quarter" set by the Variance. Please let me know when we can expect this past-due information.

### Elected Officials

*Drew Boyles,  
Mayor*

*Chris Pimentel,  
Mayor Pro Teu*

*Carol Pirsztuk,  
Councilmember*

*Scot Nicol,  
Councilmember*

*Lance Giroux,  
Councilmember*

*Tracy Weaver,  
City Clerk*

*Matthew Robinson,  
City Treasurer*

---

### Appointed Officials

*Scott Mitnick,  
City Manager*

*Mark D. Hensley,  
City Attorney*

---

### Department Directors

*Barbara Voss,  
Deputy City Manager*

*Melissa McCollun,  
Community Services*

*Joseph Lillio,  
Finance*

*Chris Donovan,  
Fire Chief*

*Donna Peter,  
Human Resources (Interim)*

*Charles Mallory,  
Information Technology Services*

*Sam Lee,  
Development Services*

*Bill Whalen,  
Police Chief*

*Elias Sassoon,  
Public Works*

**Ms. Samantha Bricker  
2020 Stipulated Variance for LAX  
September 18, 2020  
Page Two**

El Segundo is always interested in reviewing LAWA's Quarterly Noise Reports and will be particularly interested in seeing the runway usage and other data described in paragraph 9 of the Variance. We note that LAWA's powerful new noise portal (<https://noiseportal.lawa.org/lax>) contains much of this information, which we assume will make it easier for LAWA to produce its Quarterly Noise Reports in a timely manner and include all the information required by the Variance.

Sincerely,



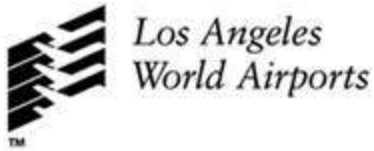
Scott Mitnick  
City Manager  
City of El Segundo

c: City Council

Enclosure: 2020 Variance granted by CALTRANS to LAX

# **EXHIBIT**

# **19**



October 1, 2020

**VIA EMAIL & U.S. MAIL**

Scott Mitnick  
City Manager  
City of El Segundo  
350 Main Street  
El Segundo, CA 90245

LAX  
Van Nuys  
City of Los Angeles

Re: LAX Noise Variance

Dear Mr. Mitnick:

Eric Garcetti  
Mayor  
Board of Airport  
Commissioners  
Sean O. Burton  
President  
Valeria C. Velasco  
Vice President  
Gabriel L. Eshaghian  
Beatrice C. Hsu  
Nicholas P. Roxborough  
Dr. Cynthia A. Telles  
Karim Webb  
Justin Erbacci  
Chief Executive Officer

I have received your letter, dated September 18, 2020, in which you enclosed the Grant of Variance signed by Caltrans ("LAX Variance"). We are aware, and mindful, of LAWA's obligations under the LAX Variance and are proceeding accordingly to comply with it.

You have requested that we provide you with an update regarding the steps LAWA is taking to start the RSI Program in the City of El Segundo ("El Segundo"), as well as anticipated next steps, funding levels and timeline/milestones. While LAWA continues to move forward, due to the financial impacts of COVID 19, we are still assessing and formulating a financial program and next steps to comply with the LAX Variance. As we mentioned to you in previous discussions, we need to obtain the services of a Project Management/Construction Management firm to setup and then implement an RSI Program. LAWA needs to conduct a competitive process, and is therefore currently following the procedure for such process in order to select this firm. Please note that, other than the time period for completion of the RSI Program that is specifically stated in the LAX Variance, such variance does not require a specific timeline/milestones for the RSI Program. As agreed upon, LAWA will use its best efforts as provided under the LAX Variance.

With regard to the Quarterly Noise Reports, LAWA is in the process of preparing the reports. Unfortunately, staffing vacancies at the beginning of the year and the effects of the COVID-19 pandemic have resulted in a delay in submitting the Quarterly Noise Reports. LAWA is working to finalize these reports for submittal as soon as possible.

Sincerely,

*Samantha Bricker*

Samantha Bricker  
Chief Sustainability and Revenue Management Officer  
Los Angeles World Airports

cc: Kathryn Pantoja



# **EXHIBIT**

# **20**



# City of El Segundo

## Office of the City Manager

February 5, 2021

**Via E-Mail and U.S. Mail**

Samantha Bricker  
 Chief Environmental and Sustainability Officer  
 Los Angeles World Airports  
 1 World Way  
 Los Angeles CA 90045  
 E-Mail: [SBRICKER@lawa.org](mailto:SBRICKER@lawa.org)

**RE: LAWA Compliance with 2020 Stipulated Variance for LAX**

Dear Ms. Bricker:

On behalf of the City of El Segundo, I am writing again to following up on efforts underway at Los Angeles World Airports ("LAWA") to comply with the 2020 Variance granted by CALTRANS for LAX. I have enclosed our prior correspondence about this issue for your ease of reference.

In my September 18, 2020 letter (enclosed), I asked you to provide me with an update regarding the steps LAWA is taking to restart the Residential Sound Insulation ("RSI") Program in El Segundo. In your October 1, 2020 response, you noted: "While LAWA continues to move forward, due to the financial impacts of COVID 19, we are still assessing and formulating a financial program and next steps to comply with the LAX Variance. As we mentioned to you in previous discussions, we need to obtain the services of a Project Management/Construction Management firm to setup and then implement an RSI Program. LAWA needs to conduct a competitive process, and is therefore currently following the procedure for such process in order to select this firm."

As we have discussed numerous times, the City of El Segundo is eager to see LAWA restart RSI in El Segundo as soon as possible. As such, please update me on all progress LAWA has made since your October 1, 2020 letter. I noticed that LAWA staff gave an RSI update to the LAWA Board of Airport Commissioners ("BOAC") Audit Committee at its special meeting on January 27, 2021, but I was disappointed that update did not include any new information about LAWA's work to restart RSI in El Segundo.

Additionally, as you know, the Variance requires LAWA to timely provide specific information to the public in Quarterly Noise Reports. The last Quarterly Noise Report released by LAWA for LAX covered the fourth quarter of 2019. We are now well into 2021 and have yet to see any reports from 2020. In other words, LAWA continues not to meet the deadline of "45 days after the end of the calendar quarter" set by the Variance. You have previously indicated that this past-due information will be released, but it is not yet available. I have asked El Segundo's attorneys to advise Caltrans of this delay.

Sincerely,

Scott Mitnick  
 City Manager

Enclosures:

1. September 18, 2020 letter to Samantha Bricker
2. October 1, 2020 letter from Samantha Bricker

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**Elected Officials**

*Drew Boyles,*  
 Mayor

*Chris Pimentel,*  
 Mayor Pro Tem

*Carol Pirsztuk,*  
 Councilmember

*Scot Nicol,*  
 Councilmember

*Lance Giroux,*  
 Councilmember

*Tracy Weaver,*  
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 Deputy City Manager

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 Chief Financial Officer

*Melissa McCollum,*  
 Community Services Director

*Sam Lee,*  
 Development Services Director

*Chris Donovan,*  
 Fire Chief

*Donna Peter,*  
 Human Resources Director  
 (Interim)

*Charles Mallory,*  
 IT Director

*Bill Whalen,*  
 Police Chief

*Elias Sassoon,*  
 Public Works Director

# **EXHIBIT**

# **21**

FILED

STATE OF CALIFORNIA  
DEPARTMENT OF TRANSPORTATION

Date: 8/20/20

BEFORE THE DEPARTMENT OF TRANSPORTATION  
OF THE STATE OF CALIFORNIA

by *Christina J. ...*  
Administrative Hearings Clerk

In the Matter of the Noise Variance  
Application of:  
  
CITY OF LOS ANGELES,  
DEPARTMENT OF AIRPORTS  
FOR LOS ANGELES INTERNATIONAL  
AIRPORT (LAX)

Applicant

GRANT OF VARIANCE

With respect to the above entitled matter, the State of California, Department of Transportation, Division of Aeronautics (hereinafter the "Department") makes the following findings of fact and determinations of the issues and renders its decision as follows:

The City of Los Angeles, Department of Airports, known as Los Angeles World Airports (hereinafter "LAWA"), requested from the Department a variance for Los Angeles International Airport (hereinafter "LAX") from the Noise Standards contained in California Code of Regulations (hereinafter "CCR"), Title 21, subchapter 6. The State of California, under statute, has airport noise standards that govern the operation of airports operating under a valid permit issued by the Department. (Public Utilities Code section 21669.) The noise standards are contained in the CCR, Title 21, section 5000, et seq. The stated purpose of the noise standards is "to accomplish resolution of existing noise problems in communities surrounding airports and to prevent the development of new noise problems." (Section 5010.)

Section 5012 of the noise standards states the following:

The standard for the acceptable level of aircraft noise for persons living in the vicinity of airports is hereby established to be a community noise equivalent level of 65 decibels. The standard forms the basis for the



1 following limitation. No airport proprietor of a noise problem airport shall  
2 operate an airport with a noise impact area based on the standard of 65 dB  
3 CNEL unless the operator has applied for or received a variance as  
prescribed in Article 5 of this subchapter.

4 The Department finds that granting a variance to LAX is justified and appropriate according to  
5 the conditions and factors in sections 5053 and 5057. The Department further finds that it is not  
6 technologically or economically feasible during the period of the next variance to reduce LAX's noise  
7 impact area to zero. The Department further finds that LAX is extremely valuable to the Los Angeles  
8 region.

9 The City of El Segundo, the County of Los Angeles, the City of Inglewood and LAWA have  
10 been engaged in good faith negotiations to reach an agreement for a Stipulated Variance regarding  
11 LAWA's request to the Department for a variance for LAX. The terms and conditions contained in the  
12 Stipulated Variance are reasonable and will advance the purposes of the CCR, Title 21, subchapter 6.

#### 13 ORDER

14 State of California, Department of Transportation, Division of Aeronautics hereby grants the  
15 application of the City of Los Angeles, Department of Airports, known as Los Angeles World Airports  
16 for a variance from the requirements of the California Code of Regulations, Title 21, Subchapter 6,  
17 section 5012, subject to the terms and conditions contained in the Stipulated Variance as follows:  
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**BEFORE THE DEPARTMENT OF TRANSPORTATION  
OF THE STATE OF CALIFORNIA**

Regarding Variance Application of:

**CITY OF LOS ANGELES,  
DEPARTMENT OF AIRPORTS  
FOR LOS ANGELES INTERNATIONAL AIRPORT (LAX)**

**STIPULATED VARIANCE REGARDING LAX**

WHEREAS,

1. On January 10, 2014, the City of Los Angeles Department of Airports, also known as Los Angeles World Airports ("LAWA"), requested from the California Department of Transportation ("Caltrans") a variance for Los Angeles International Airport ("LAX" or "Airport") from the Noise Standards contained in California Code of Regulations ("CCR"), Title 21, subchapter 6.
2. LAX currently operates under an Order regarding a stipulated variance, issued and made effective February 13, 2011.
3. The City of El Segundo and LAWA have been engaged in good faith negotiations to reach an agreement for a Stipulated Variance regarding LAWA's request to Caltrans for a variance for LAX ("Stipulated Variance").
4. The County of Los Angeles and the City of Inglewood have no objections to the Stipulated Variance.
5. The terms and conditions contained in this stipulation for a variance are reasonable and will advance the purposes of subchapter 6 of Title 21 of the California Code of Regulations.

NOW, THEREFORE, it is stipulated that Caltrans should grant the application of the City of Los Angeles Department of Airports for a variance for LAX, subject to the following terms and conditions:

1. This Stipulated Variance shall be for a period of three years from the effective date of the Order by Caltrans.

2. LAX shall continue to implement its Aircraft Noise Mitigation Program (ANMP).<sup>1</sup> LAX, with the assistance of the affected jurisdictions (the County of Los Angeles, City of Inglewood and City of El Segundo), shall update the entire ANMP from time to time to ensure that it reasonably represents the mitigation and funding programs that are in place, being implemented, or proposed for future implementation. The ANMP, which is governed by FAA Part 150 and LAWA's Supplemental Funding Policy (Board Resolution 21481), as may be amended from time to time, shall be designed to ultimately fund the mitigation of all incompatible land uses within the noise impact boundary as defined in the State Noise Standards. LAX shall use its best efforts to complete the acoustic treatment portion of the total ANMP for all affected jurisdictions within nine years from the effective date of the Order by Caltrans, although local programs operated by the County of Los Angeles and City of Inglewood may progress more or less quickly, based on the capabilities of those jurisdictions. In light of the City of El Segundo's decision to end its operation of the Residential Sound Insulation Program within its municipal boundaries, during the term of this Stipulated Variance, LAX shall be responsible for implementing the ANMP for eligible El Segundo residences. LAX shall use its best efforts to continue to streamline its supplemental funding program application processes in order to accelerate the disbursement of funds to local jurisdictions participating in the program.
  
3. LAX, with the assistance of the County of Los Angeles and the City of Inglewood, shall prepare an annual update of the numbers and tabular information within the ANMP that show the total annual funding available for noise mitigation within each affected jurisdiction and the annual performance of each jurisdiction in its efforts to achieve the mitigation of incompatible land uses. However, nothing in this Stipulated Variance obligates LAX to implement a specific type of noise mitigation as it relates to the City of El Segundo. LAX continues to have the options accorded under Title 21 of the California Code of Regulations, Section 5014. In the event that the County of Los Angeles and/or the City of Inglewood is unable or unwilling to assist LAX in updating this information, LAX shall proceed using the best information available and shall document the use of estimated information in the update. LAX shall include this updated information with its second quarter "quarterly report" information that it sends to the County of Los Angeles pursuant to the reporting requirements within the State Noise Standards.
  
4. LAX shall continue in full force and effect, the implementation and enforcement of the following existing noise abatement policies<sup>2</sup> to the extent of its authority:
  - a. No turns before the shoreline;

<sup>1</sup> Although LAWA is the operator, the "terms and conditions" in the Stipulated Variance reference "LAX" in order to indicate the airport affected, since LAWA operates more than one airport.

<sup>2</sup> These policies are articulated in the section of the LAX Rules and Regulations entitled "Section 13, Noise Abatement".

- b. Over-ocean operations between 0000 and 0630, weather permitting;
  - c. Helicopter noise mitigation policies;
  - d. Preferential runway use policies;
  - e. Imperial Terminal procedures; and
  - f. Maintenance run-up restrictions.
5. To facilitate compliance with its "no turns before the shoreline" policy, LAX shall use its best efforts to reduce the number of early turns by continuing to work with the Federal Aviation Administration ("FAA") and pilots to address the various causes for early turns. These efforts shall include, without limitation, continuing to consider emerging technologies that assist with the precise definition of the shoreline that assist pilots in maintaining a straight bearing upon departure, and that otherwise prevent early turns.
  6. Within three years from the effective date of the Order by Caltrans, LAX shall update its April 11, 2014 Report on Implementation of the Preferential Runway Use Policy at LAX to reevaluate conditions related to compliance with the policy, how the policy is implemented, and means for improving compliance. LAX will consult with operators, the FAA, and the LAX/Community Noise Roundtable as necessary in performing this analysis. LAX will draft an update to the 2014 report which may include recommendations for actions that may lead to better policy compliance and/or implementation.
  7. Within 45 days after the end of the calendar quarter, LAX shall provide the information to the County of Los Angeles that the County needs to prepare its Quarterly Reports of Noise Monitoring. LAX shall include a brief report regarding the implementation of each of the conditions to this Stipulated Variance with the noise monitoring information forwarded each quarter. With its second calendar quarter information, LAX shall additionally include the information as described in condition 3 above.
  8. Concurrent with its submittal to Caltrans of any proposed new or modified noise monitoring plan or system pursuant to CCR, title 21, section 5033, LAX shall provide the County with a copy of its submittal for review and consideration. LAX shall cooperate with the County in any reasonable request of the County for review or audit of LAX's noise monitoring system for compliance with the requirements of the State Noise Standards consistent with section 21669.4, subdivision (b), of the California Public Utilities Code.
  9. LAX will include in each quarterly report tabular data and graphical illustrations describing and comparing the level and type of usage for each runway at LAX during the quarter. Specifically, the report shall include: (a) the average number of arrivals and departures conducted daily in each direction on each runway during all hours and during nighttime hours (10 p.m.-7 a.m.); and (b) percentage of arrivals and departures conducted

on each runway in each direction during all hours and nighttime hours (10 p.m.-7 a.m.). LAX shall also include in its quarterly reports, as soon as practicable, the average number of arrivals and departures conducted daily by aircraft type (e.g., wide-body, narrow-body, regional jet) and model (e.g., Boeing 747) on each runway during all hours and during nighttime hours (10 p.m.-7 a.m.). Data used to calculate the average numbers referenced above shall be retained for at least three years and shall be made available to the public upon request. LAX shall also provide the runway usage data contained in its quarterly reports to the FAA for the FAA's use in monitoring air traffic runway usage that could potentially result in a shift in noise.

- 10. LAX shall continue to conduct nightly monitoring with respect to its maintenance run-up curfew. LAX shall maintain records of its monitoring and enforcement activities. LAX shall include in each quarterly report information regarding monitoring and enforcement activities undertaken during the quarter. Specifically, the report shall include: (a) a brief description of LAX's curfew monitoring efforts; (b) the time, date and location of each curfew violation as well as the company performing the maintenance run-up; and (c) follow-up and/or enforcement actions taken by LAX in response to curfew violations.
- 11. LAX shall take reasonable steps to ensure that the Airport's noise complaint hotline has the capability of providing a live answer as appropriate, and shall ensure that any complaints left as voicemail messages are retrieved and responded to appropriately in a timely manner.
- 12. This Stipulated Variance excuses LAX from meeting the requirement that there be no noise impact area based upon the airport noise standards identified in CCR, title 21, Section 5012 for the term of the Stipulated Variance. However, in the event that LAX violates any of the above terms or conditions, such conduct shall constitute a cause for the termination or further conditioning of this Stipulated Variance. Also, pursuant to Public Utilities Code sections 21669.2, subdivision (a), and 21669.4, subdivision (b), and CCR, title 21, section 5022, it is the function of the county wherein the airport is located to enforce the state noise regulations.

(CONTINUED)

13. The above provisions of this Stipulated Variance are subject to FAA rules, regulations, legal requirements and approvals, including but not limited to, airport guidance regarding the use of airport revenue for sound insulation.

**CITY OF LOS ANGELES**

MICHAEL N. FEUER, City Attorney  
RAYMOND ILGUNAS, General Counsel  
TIM DAZE, Assistant General Counsel

Dated: 5/1/, 2020

By: Rosario Tobias  
ROSARIO TOBIAS  
Deputy City Attorney  
Attorneys for City of Los Angeles (Los Angeles  
Department of Airports, also known as Los Angeles  
World Airports)

**CITY OF EL SEGUNDO**

SHUTE, MIHALY & WEINBERGER

Dated: \_\_\_\_\_, 2020

By: \_\_\_\_\_  
OSA WOLFF  
Attorneys for the City of El Segundo

**COUNTY OF LOS ANGELES**

MARY C. WICKHAM  
County Counsel

Dated: \_\_\_\_\_, 2020

By: \_\_\_\_\_  
RORY ALLEN  
Attorneys for the County of Los Angeles

(SIGNATURE PAGE CONTINUES)

13. The above provisions of this Stipulated Variance are subject to FAA rules, regulations, legal requirements and approvals, including but not limited to, airport guidance regarding the use of airport revenue for sound insulation.

**CITY OF LOS ANGELES**

MICHAEL N. FEUER, City Attorney  
RAYMOND ILGUNAS, General Counsel  
TIM DAZE, Assistant General Counsel

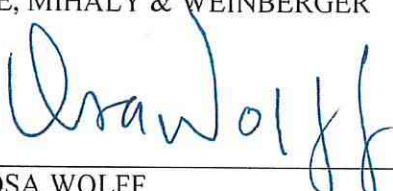
Dated: \_\_\_\_\_, 2020

By: \_\_\_\_\_  
ROSARIO TOBIAS  
Deputy City Attorney  
Attorneys for City of Los Angeles (Los Angeles  
Department of Airports, also known as Los Angeles  
World Airports)

**CITY OF EL SEGUNDO**

SHUTE, MIHALY & WEINBERGER

Dated: March 9, 2020

By:   
\_\_\_\_\_  
OSA WOLFF  
Attorneys for the City of El Segundo

**COUNTY OF LOS ANGELES**

MARY C. WICKHAM  
County Counsel

Dated: \_\_\_\_\_, 2020

By: \_\_\_\_\_  
RORY ALLEN  
Attorneys for the County of Los Angeles

(SIGNATURE PAGE CONTINUES)

13. The above provisions of this Stipulated Variance are subject to FAA rules, regulations, legal requirements and approvals, including but not limited to, airport guidance regarding the use of airport revenue for sound insulation.

**CITY OF LOS ANGELES**

MICHAEL N. FEUER, City Attorney  
RAYMOND ILGUNAS, General Counsel  
TIM DAZE, Assistant General Counsel

Dated: \_\_\_\_\_, 2020

By: \_\_\_\_\_  
ROSARIO TOBIAS  
Deputy City Attorney  
Attorneys for City of Los Angeles (Los Angeles  
Department of Airports, also known as Los Angeles  
World Airports)

**CITY OF EL SEGUNDO**

SHUTE, MIHALY & WEINBERGER

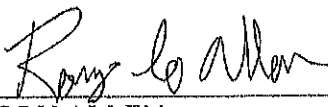
Dated: \_\_\_\_\_, 2020

By: \_\_\_\_\_  
OSA WOLFF  
Attorneys for the City of El Segundo

**COUNTY OF LOS ANGELES**

MARY C. WICKHAM  
County Counsel

Dated: April 24, 2020

By:  \_\_\_\_\_  
RORY ALLEN  
Attorneys for the County of Los Angeles

(SIGNATURE PAGE CONTINUES)



CITY OF INGLEWOOD  
BUCHALTER LAW FIRM

Dated: 3/4, 2020

By: Barbara Lichman  
BARBARA LICHMAN  
Attorneys for the City of Inglewood

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TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

The foregoing and attached hereto, is a copy of the Decision of the State of California, acting by and through the Department of Transportation, Division of Aeronautics, in the matter of the noise variance application of the City of Los Angeles, Department of Airports, as known as Los Angeles World Airports for the Los Angeles International Airport.

This decision shall become effective 14 August 2020.

IT IS SO ORDERED this 14th day of August, 2020.

By Amy Choi  
AMY CHOI,  
State of California, Department of Transportation,  
Chief of the Division of Aeronautics

# **EXHIBIT**

# **22**

## ESTIMATED DAILY ROADWAY CAPACITY

| Master Plan Roadway Classification    | Number of Roadway Lanes (a) | Estimated Daily Roadway Capacity (b) |
|---------------------------------------|-----------------------------|--------------------------------------|
| Major Arterial                        | 8LD                         | 70,000                               |
| Secondary Arterial (Six Lane Divided) | 6LD                         | 53,000                               |
| Collector (4-Lane Divided)            | 4LD                         | 40,400                               |
| Collector 4-Lane                      | 4LU                         | 31,000                               |
| Collector 2-Lane                      | 2LU                         | 14,000                               |
| Local                                 | 2LU                         | 10,000                               |

- (a) 8 LD = Eight (8) lanes divided  
 6 LD = Six (6) lanes divided  
 4 LD = Four (4) lanes divided  
 4 LU = Four (4) lanes undivided  
 2 LU = Two (2) lanes undivided

- (b) Estimated Daily Roadway Capacity at Level of Service "E" is considered to be the carrying capacity of the roadway. Numbers indicate vehicles per day for roadway system planning. Volume to Capacity (v/c) ratios are computed on the basis of LOS E capacity. If the v/c ratio exceeds 1.00, the roadway LOS would be F. A v/c ratio between 0.81 and 0.90 indicates LOS D, and a v/c ratio between 0.91 and 1.00 indicates LOS E.

Note: It is the goal of the City of El Segundo to achieve and maintain LOS D or better on the City's arterials. The City considers LOS C to be desirable and LOS D to be marginally acceptable for roadway segments. LOS E and LOS F are not acceptable.



# CITY OF INGLEWOOD

## ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT

### Planning Division



Christopher E. Jackson, Sr.  
Director

Mindy Wilcox, AICP  
Planning Manager

March 15, 2021

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

### Re: LAWA Airfield and Terminal Modernization Project DEIR

Dear Ms. Quintanilla:

The City of Inglewood has received the Notice of Availability of the Draft Environmental Impact Report (DEIR) for the Los Angeles World Airports (LAWA) Airfield and Terminal Modernization Project (Project). The draft document has been reviewed by: the Economic and Community Development (ECD) Department-Planning Division; the Residential Sound Insulation Department; and the Public Works (PW) Department-Transportation and Traffic Division. Below are their comments:

#### **ECD Department-Planning Division**

1. The document indicates that the efficiency improvements associated with the Project will effectively facilitate an increase in daily aircraft operations (Table 4.7.1-10). Please ensure that this daily increase has been adequately considered in conducting all environmental topic areas. For any questions regarding this response, please contact Senior Planner Bernard McCrumby at (310) 412-5230 or [bmccrumby@cityofinglewood.org](mailto:bmccrumby@cityofinglewood.org).

#### **Residential Sound Insulation Department**

2. As you know, the City of Inglewood is in very close proximity to LAX and located under the flight path. Increasing daily flights should be carefully evaluated to ensure an accurate assessment of daily/ongoing noise impacts for people on the ground. Recently released results of the Federal Aviation Administration's (FAA) Neighborhood Environmental Survey (February 2021) determined that the method the FAA uses to measure noise annoyance is deeply flawed. The survey found that two-thirds of people living in the 65 db DNL noise contour of airports were highly annoyed by aircraft noise, compared to only 12.3 percent of people highly annoyed predicted by FAA's current methodology. The findings of this study necessitate a re-examination of the City of Inglewood noise contour map as the increase in daily aircraft operations will result in more noise in the current contours (Figure 4.7.1-9). For any questions

City of Inglewood DEIR Comment Letter  
March 15, 2021  
Page 2 of 2

regarding this response, please contact RSI Director Bettye Griffith at (310) 412-5289 or [bgriffith@cityofinglewood.org](mailto:bgriffith@cityofinglewood.org).

**Public Works- Transportation and Traffic Division**


3. In the VMT Reduction Plan there is mention of On Demand Micro-Transit Shuttles (page 4.8-53). The City looks forward to continuing the Employee Shuttle Program and coordinating the operation, maintenance, and management of this VMT Reduction Plan as the program transitions into a permanent program.
4. As it relates to traffic analysis, it is unclear if the DEIR analysis/methodology includes the cumulative traffic impacts related to the Inglewood Basketball and Entertainment Center (LA Clippers Arena). Please confirm.

For any questions regarding this response, please contact Principal City Traffic Engineer Peter Puglese at (310) 412-5333 or [ppuglese@cityofinglewood.org](mailto:ppuglese@cityofinglewood.org).

Based on the changes to Transportation and Noise that are projected to occur as a result of the Project, we would like to ensure that the impacts are mitigated to the maximum extent feasible.

Thank you for considering our comments on the DEIR. As LAWA and City of Inglewood continue to drive major regional economic stimulus through development, transportation infrastructure, and job creation opportunities, we look forward to continued partnership. If you have any additional questions regarding this letter, please contact Planning Manager, Mindy Wilcox, AICP at [mwilcox@cityofinglewood.org](mailto:mwilcox@cityofinglewood.org) or (310) 412-5230.

Respectfully,



Christopher E. Jackson, Sr.  
Director

cc. James T. Butts, Jr., Mayor, City of Inglewood  
Artie Fields, City Manager, City of Inglewood

**From:** Alvie Betancourt <[abetancourt@carsonca.gov](mailto:abetancourt@carsonca.gov)>  
**Date:** March 22, 2021 at 2:22:39 PM PDT  
**To:** "QUINTANILLA, EVELYN Y." <[EQuintanilla@lawa.org](mailto:EQuintanilla@lawa.org)>  
**Cc:** Lucille Sandoval <[lsandoval@carsonca.gov](mailto:lsandoval@carsonca.gov)>  
**Subject:** City comments: LAX Airfield and Terminal Modernization

Ms. Quintanilla,

Please see attached comment letter from the City of Carson regarding the proposed LAX Airfield and Terminal Modernization. Thank you for the opportunity to comment on this draft EIR. Should you have any questions, please feel free to contact Saied Naaseh, Community Development Director City of Carson at 310-952-1770 [snaaseh@carsonca.gov](mailto:snaaseh@carsonca.gov).

Best,

**Alvie Betancourt** | Planning Manager  
[City of Carson](#) | [Community Development](#) | [Planning Division](#)  
701 East Carson Street, Carson, CA 90745  
P: 310.952.1761 x 1365  
F: 310.835.5749

*City Hall Hours: Monday – Thursday, 7:00 a.m. – 6:00 p.m.*



# CITY OF CARSON

March 17, 2021

Evelyn Quintanilla  
 Chief of Airport Planning II Los Angeles World Airports 1 World Way  
 Los Angeles, CA 90045

RE: City of Carson Comments on the LAX Airfield & Terminal Modernization Project Draft Environmental Impact Report

Dear Ms. Quintanilla:

The City of Carson has reviewed Los Angeles World Airport's (LAWA) draft Environmental Impact Report (EIR) for the proposed LAX Airfield & Terminal Modernization Project (ATMP) and is raising the following concerns that should be addressed in the Final Draft and Response to Comments:

- 1. Enhanced regionalization.** The SBCCOG strongly supports prioritizing efforts to regionalize air traffic to other airports such as Ontario International Airport and Palmdale Regional Airport. As the world begins to emerge from the COVID-19 pandemic and as air traffic begins to return to pre-pandemic levels, there should be a concerted effort to encourage regionalization. Airport officials must begin looking into ways that will encourage major air carriers of both passenger and cargo loads to return to Los Angeles' regional airports, not only LAX.
- 2. Growth Projections.** Although both SCAG and LAWA project air traffic growth at LAX regardless of the ATMP, it behooves all stakeholders to evaluate the long-term impacts of COVID-19 on previous growth projections. Although the current downturn in air traffic will likely rebound in the coming years, it is important to evaluate the long-term behavioral changes accelerated by the pandemic. For example, population centers may shift inland in the next 25 years due to the ability to work remotely and business travel may not return to previous levels.

Additionally, it is imperative that evaluations be done to study if growth forecasts for other regional airports such as Ontario International, can accommodate their planned growth without additional infrastructure investments. Growth at Ontario will likely not perform to forecast levels if that facility cannot accommodate the additional air traffic, which could have long-lasting negative impacts on efforts at regionalization. If significant infrastructure expansion is needed to facilitate that growth, implementation of those improvements must be a top priority of the region. Otherwise, the ATMP will by default induce growth at LAX because the other airports will not be able to accommodate their increasing traffic and airlines will choose to go back to LAX because it will have the capacity and new facilities.

- 3. Traffic Impacts to the South Bay.** The City of Carson believes that the draft EIR does not adequately evaluate impacts to motorists coming from the South Bay. Although CEQA may not require it, LAWA should not use the Vehicle Miles Traveled standard to avoid responsibility for the increased congestion on the critical thoroughfares that will directly result from this large airport expansion. In particular, LAWA should work with other stakeholders such as the SBCCOG, LA Metro, Caltrans, and surrounding



cities who have been working together to identify freeway improvements and can do so again to address off site roadway mitigation improvements necessitated by this project. Even though LAWA may be have restrictions by the FAA on paying for these off-facility improvements, the impacts to these facilities occur, nonetheless. For example, it may prove beneficial for LAWA to work with other implementing agencies to address the Century Boulevard exit on the northbound I-405 to allow motorists to head west on Century Boulevard without the need for a traffic signal.

Thank you for providing an opportunity to comment on this draft EIR. Should you have any questions, please feel free to contact me at 310-952-1770 or [snaaseh@carsonca.gov](mailto:snaaseh@carsonca.gov).

Sincerely,

A handwritten signature in cursive script that reads "Saied Naaseh".

Saied Naaseh  
Community Development Director City of Carson

**From:** "Johnson, Matthew" <MJohnson@bos.lacounty.gov>  
**Date:** April 1, 2021 at 5:10:09 PM PDT  
**To:** "QUINTANILLA, EVELYN Y." <EQuintanilla@lawa.org>  
**Cc:** "BRICKER, SAMANTHA" <SBRICKER@lawa.org>, "Klipp, Luke" <LKlipp@bos.lacounty.gov>  
**Subject: RE: ATMP Draft EIR Comment Extension request**

Hi Evelyn-

Please see the attached letter from Supervisor Hahn regarding the ATMP Draft EIR.

Thank you,

Matt

**Matt Johnson**

Deputy

LA County Supervisor Janice Hahn

O: 310.519.6021

C: 323.397.4810



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**JANICE HAHN**

Fourth District

April 1, 2021

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

Dear Ms. Quintanilla,

Please accept the following comments on the Los Angeles World Airports (LAWA) Draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Airfield and Terminal Modernization Project (ATMP). The Fourth District encompasses LAX and communities immediately along LAX's northern and southern boundaries, I want to ensure that my communities' voices are heard and incorporated into this project.

There are several specific comments I would like to offer on the DEIR and the development of the ATMP:

- While it may be using the appropriate metric with Vehicle Miles Traveled (VMT) to measure transportation impacts, LAWA has not sufficiently shown the ATMP's tangible impacts to communities like El Segundo and Manhattan Beach. This project should be able to reduce the amount of cars traveling to and from LAX on Lincoln Boulevard, Pacific Coast Highway, Sepulveda Boulevard, and Aviation Boulevard.
- The ATMP should center its integration into Los Angeles' growing transit and multi-modal network. I understand that the Landside Access Modernization Program will provide a direct connection into LA's light-rail network. Also, ATMP is an opportunity to do more, including transportation demand management, incentives, and physical infrastructure, all of which would strengthen the connection between LAX and LA's growing transit and multi-modal opportunities. LAWA could set a new national standard through an ATMP that supports all the ways that people move around in Los Angeles.

I look forward to ongoing engagement around this project and appreciate your consideration of my comments.

Sincerely,



JANICE HAHN  
Supervisor, Fourth District

CC: Justin Erbacci, Chief Executive Officer, Los Angeles World Airports  
Samantha Bricker, Chief-Sustainability & Revenue Management, Los Angeles World Airports  
Michelle Schwartz, Chief-Corporate Strategy & Affairs, Los Angeles, World Airports

**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Thursday, October 29, 2020 8:14:54 PM



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

Changes since 10/29/20 8:12 PM

1 row added

1 row added or updated (shown in yellow)

Row 53

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 53  |
| <b>Full Name</b>     | Mark R. Johnston  |
| <b>Company Name</b>  |   |
| <b>Email Address</b> | canammj@yahoo.com   |
| <b>Comments</b>      | I am ok with adding terminal "0" as its really just an expansion of existing terminal "1". I don't see the need to rush terminal "9" until we see how plane travel rebounds and specifically international travel, considering you are just finishing a international expansion with the mid-field concourse which would at least serve multiple airlines, while terminal "9" would be United only at this point, thus you really have to make sure United really intends to expand its flight offerings, especially international. Also consider the fact that American announced something along the lines of not having LAX as a hub and it could be very well United could say the same thing and consolidate to SFO. People mover and road improvements still would be needed regardless. Also, any way to get rid of the blizzard of power poles and billboards around the airport? Makes the airport look cheap / junky and does not make for a good first impression. |
| <b>Created</b>       | 10/29/20 8:12 PM  |
| <b>Project</b>       | ATMP-Draft EIR  |

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**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Date:** November 1, 2020 at 9:23:47 AM PST  
**To:** "MARTINEZ-SIDHOM, BRENDA" <BMARTINEZ-SIDHOM@lawa.org>  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Reply-To:** FABIAN RAYGOSA <fraygosa@lawa.org>



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

Changes since 11/1/20 9:21 AM

1 row added

1 row added or updated (shown in yellow)

Row 54

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 54  |
| <b>Full Name</b>     | Julie C.  |
| <b>Company Name</b>  |   |
| <b>Email Address</b> | julie_agencybiz@yahoo.com   |
| <b>Comments</b>      | Hello. I have a question re: how this project will affect airport noise. I live directly to the side of LAX and I am already having issues with Airport noise My second question is - is there any soundproofing project currently in the works for the neighborhood? I live in Playa Del Rey on Falmouth Ave. I would appreciate having my patio doors replaced with soundproofed doors as other neighbors have received at no cost from an Airport budget in the past. Please let me know your thoughts. Thank you! |
| <b>Created</b>       | 11/01/20 9:21 AM  |
| <b>Project</b>       | ATMP-Draft EIR  |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Saturday, November 7, 2020 1:06:55 PM



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

Changes since 11/7/20 1:04 PM

1 row added

1 row added or updated (shown in yellow)

Row 55

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 55   |
| <b>Full Name</b>     | Phil Trembath                                      |
| <b>Company Name</b>  | SPIRIT CHb Inc                                     |
| <b>Email Address</b> | Philtrembath@icloud.com                            |
| <b>Comments</b>      | How do I sign up for virtual meeting on 12/01/2020 |
| <b>Created</b>       | 11/07/20 1:04 PM                                   |
| <b>Project</b>       | ATMP-Draft EIR                                     |

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**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Friday, November 13, 2020 3:22:58 PM



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

Changes since 11/13/20 3:20 PM

1 row added

1 row added or updated (shown in yellow)

Row 58

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 58   |
| <b>Full Name</b>     | Hans Cua   |
| <b>Company Name</b>  |  |
| <b>Email Address</b> | hanscua@yahoo.com  |
| <b>Comments</b>      | I am opposing LAX ATMP and expansion of concourse 0 and terminal 9. The expansion would cause international flights to be moved from Tom Bradley terminal to terminal 9. Ongoing construction of this project would cause heavy traffic, noise, and pollution to the surrounding cities and neighborhoods. |
| <b>Created</b>       | 11/13/20 3:20 PM   |
| <b>Project</b>       | ATMP-Draft EIR   |

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**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Friday, November 20, 2020 1:03:45 PM

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

Changes since 11/20/20 1:01 PM

1 row added

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1 row added or updated (shown in yellow)

Row 59

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 59                                     |
| <b>Full Name</b>     | Jeffrey M Moskin                       |
| <b>Company Name</b>  | Raintree Condo and Townhouse Assn      |
| <b>Email Address</b> | jeffmoskin@gmail.com                   |
| <b>Comments</b>      | Can I get a copy of the CEQA document? |
| <b>Created</b>       | 11/20/20 1:01 PM                       |
| <b>Project</b>       | ATMP-Draft EIR                         |

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**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Thursday, November 12, 2020 12:06:29 PM



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

Changes since 11/12/20 12:04 PM

1 row added

1 row added or updated (shown in yellow)

Row 57

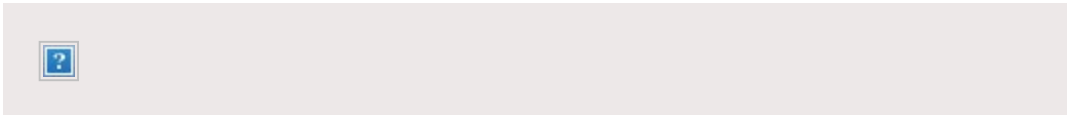
|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 57  |
| <b>Full Name</b>     | Cary Adams  |
| <b>Company Name</b>  |   |
| <b>Email Address</b> | cavalleyboy@earthlink.net   |
| <b>Comments</b>      | The plans seem well thought-out especially considering the space constraints. Recalling the theme building when a kid, I worry it will become lost in all this new construction. Though it might have historic status, has there been any interest to rise it to a prominent level? Could a new structure be constructed in its place with it raised to the top? It's a real shame to loose the visual. |
| <b>Created</b>       | 11/12/20 12:04 PM   |
| <b>Project</b>       | ATMP-Draft EIR  |

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**From:** [CRUZ, OHASSY C.](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** RE: Addition to Our LAX Comment Form: Notification  
**Date:** Tuesday, November 10, 2020 2:31:23 PM

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

Changes since 11/10/20 11:35 AM

1 row added

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1 row added or updated (shown in yellow)

Row 56

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 56   |
| <b>Full Name</b>     | Shana Aelony   |
| <b>Company Name</b>  |  |
| <b>Email Address</b> | <a href="mailto:sracam@gmail.com">sracam@gmail.com</a>   |
| <b>Comments</b>      | Please extend the comment period, together we can make this a much better project for the community and passengers |
| <b>Created</b>       | 11/10/20 11:35 AM  |
| <b>Project</b>       | ATMP-Draft EIR   |

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**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Wednesday, November 25, 2020 4:03:42 PM



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

Changes since 11/25/20 4:01 PM

1 row added

1 row added or updated (shown in yellow)

Row 60

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 60  |
| <b>Full Name</b>     | Grant Francis   |
| <b>Company Name</b>  | neighbor  |
| <b>Email Address</b> | granttfrancis@gmail.com   |
| <b>Comments</b>      | While traveling in my car southbound on Sepulveda, why do you need two lanes for left turns, at 96th st, when you can also get to the CTA by being in the far right lane and take the overpass, over sepulveda? |
| <b>Created</b>       | 11/25/20 4:01 PM  |
| <b>Project</b>       | ATMP-Draft EIR  |

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**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Wednesday, December 2, 2020 12:20:58 AM



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

Changes since 12/2/20 12:18 AM

1 row added

1 row added or updated (shown in yellow)

Row 61

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 61  |
| <b>Full Name</b>     | Ryan Williams   |
| <b>Company Name</b>  | Lennox School District  |
| <b>Email Address</b> | Rwillemc2@gmail.com   |
| <b>Comments</b>      | How will this reduce the overall traffic at the airport and shift flights to other regional airports? We need less flights flying into LAX, not "more jobs". Shift flights to other airports. |
| <b>Created</b>       | 12/02/20 12:18 AM   |
| <b>Project</b>       | ATMP-Draft EIR  |

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**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Thursday, December 3, 2020 2:52:15 PM



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

Changes since 12/3/20 2:50 PM

1 row added

1 row added or updated (shown in yellow)

Row 62

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 62   |
| <b>Full Name</b>     | Alan Rabkin  |
| <b>Company Name</b>  |  |
| <b>Email Address</b> | arabkin@earthlink.net  |
| <b>Comments</b>      | <p>Thank you for the opportunity to comment on the Draft EIR for the Modernization Project. The Project is variously described throughout the report as a modernization, expansion, improvement, extension and other similar words. It is, of course, an expansion of the current terminal footprint at LAX and it comes with the various noise, traffic and pollution impacts that any expansion of this type would create. First, our residence has been in our family for about 70 years and is a single owner property. We predate the most significant expansion efforts in the 70's, 80's 90's and more recently. We are clearly within the contours of noise and pollution as we are just one block North of the North Airfield and can see the airport perimeter fence at the end of our block. We are also on raised ground. I wish to mention two items that need clarification in the Draft EIR. They are: 1. Noise. It is acknowledged that noise will be an impact to those already within the 65 CNEL contours (which we are). The mitigation of those impacts per the MM-AN (ATMP)-1 mitigation program are a vague reference to FAA requirements and the LAX 150 NEM "then in effect" when the expansion is completed. This vagueness creates two issues. First, it does not provide adequate information as to likely mitigation to impacted residences such as ours under the assumptions in the Draft EIR. For example, whether acquisition of residences would be required if the assumptions of the Draft EIR proved to be an underestimate (such as in the Sunridge mitigation of the 1970's); or, if a new round of mitigation by soundproofing would be undertaken. The soundproofing mitigation of the late 1990's is now over 20 years ago; the quality of those soundproofing efforts have proven to not be lasting; and,</p> |

under the Draft EIR what new soundproofing would be undertaken under current standards? It should be also noted for this category that the laws, rules and regulation regulating airport noise from an FAA/City standard are not necessarily binding under inverse condemnation/partial or full taking standards under California real estate laws. The precise nature of any anticipated mitigation, therefore, needs to be adequately defined so as to make the Draft EIR meaningful on the noise issue mitigation efforts rather than keeping those efforts vague and subject to some undefined future standard. Further, discussion of flow control or slotting of overnight arrivals and departures as to the noise aspect is not discussed in a meaningful way. Other airports, for example Toronto's urban airport, utilize flow control, slotting and curfew standards to attempt to further overnight noise abatement standards. 2. Transportation. The Transportation discussion needs to include the impact of the expansion on off-airport parking in the communities of Westchester, Playa del Rey, Inglewood and El Segundo. With the advent of ride share services, it is far more practical for passengers and airport workers to elect to park their vehicles purportedly for free in the communities mentioned to avoid the parking areas maintained by LAWA for paid parking. Such off-airport parking may or may not be legal but it is a major impact of terminal expansion, Expansion of terminals to include Terminals 0 and 9 will clearly exacerbate this issue and it is important that the Draft EIR reflect the significant and ongoing community impacts caused by off-airport parking by passengers and airport workers and what mitigation efforts might be taken to avoid this outcome (such as free or expanded economy parking lots or areas that would make off-airport parking less likely). For example, such lots might utilize easily available space along the Westchester Parkway corridor with shuttle services. Also related to transportation is a lack of discussion of more advanced transportation systems now being tested and likely to be implemented before the 2028 completion of this project. For example, Tesla and/or Virgin Hyperloop.

|                |                  |
|----------------|------------------|
| <b>Created</b> | 12/03/20 2:50 PM |
| <b>Project</b> | ATMP-Draft EIR   |

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**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Saturday, December 5, 2020 4:14:39 PM



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

Changes since 12/5/20 4:12 PM

1 row added

1 row added or updated (shown in yellow)

Row 63

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 63  |
| <b>Full Name</b>     | Christopher McKinnon  |
| <b>Company Name</b>  |   |
| <b>Email Address</b> | travel@afewgoodideas.com  |
| <b>Comments</b>      | Please close the Central Terminal area to all traffic except passenger including taxi vehicle dropoffs and pickups. All other customers should use easily accessible train or people mover or pedestrian walkways to Hotel, Parking and Metro train or bus. |
| <b>Created</b>       | 12/05/20 4:12 PM  |
| <b>Project</b>       | ATMP-Draft EIR  |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

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**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Monday, December 7, 2020 10:26:10 AM



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

Changes since 12/7/20 10:24 AM

1 row added

1 row added or updated (shown in yellow)

Row 64

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 64  |
| <b>Full Name</b>     | Denia Lanza-Campos  |
| <b>Company Name</b>  | Walsh Construction Company  |
| <b>Email Address</b> | dlanzacampos@walshgroup.com   |
| <b>Comments</b>      | 1. What is the estimated construction cost for the ATMP Project? 2. Will the project be broken out into various smaller projects for bidding purposes? 3. What is the procurement delivery method for the ATMP project? Design Build, CMGC, Hard Bid? |
| <b>Created</b>       | 12/07/20 10:24 AM   |
| <b>Project</b>       | ATMP-Draft EIR  |

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**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Thursday, December 24, 2020 9:08:04 AM



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

Changes since 12/24/20 9:05 AM

1 row added

1 row added or updated (shown in yellow)

Row 65

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 65   |
| <b>Full Name</b>     | Patricia Grace   |
| <b>Company Name</b>  |  |
| <b>Email Address</b> | pdr309kma@gmail.com  |
| <b>Comments</b>      | I've been a long-time resident of Westchester and held a long-time ill feeling towards LAWA for taking land from the City. I have been watching LAWA work with the community and the construction to modernize. I must let you know that I'm very proud of our LAWA. |
| <b>Created</b>       | 12/24/20 9:05 AM   |
| <b>Project</b>       | ATMP-Draft EIR   |

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-----Original Message-----

From: Kevin Su <[kevinsu77979@gmail.com](mailto:kevinsu77979@gmail.com)>

Sent: Tuesday, December 1, 2020 4:30 PM

To: Sparling, Daniel C. <[sparlingdc@cdmsmith.com](mailto:sparlingdc@cdmsmith.com)>

Subject: Airfield and Terminal Modernization

Hi,

I was wondering roughly when will terminal 0 and terminal 9 begin ? When would general contractors began to bid for these projects ?

Sent from my iPad

---

**From:** Coby King <coby@hpstrat.com>  
**Sent:** Tuesday, January 12, 2021 4:54 PM  
**To:** Sotelo, Anjello <ASotelo@elsegundo.org>; QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>  
**Cc:** Mitnick, Scott <smitnick@elsegundo.org>; Hensley, Mark <mhensley@hensleylawgroup.com>; Sassoon, Elias <esassoon@elsegundo.org>; Osa Wolff <wolff@smwlaw.com>; BRICKER, SAMANTHA <SBRICKER@lawa.org>; Joseph D. Petta <petta@smwlaw.com>  
**Subject:** RE: 2nd Request to Extend Deadline for Public Comment re: LAX ATMP DEIR

And here is a similar letter from the Neighborhood Council of Westchester Playa.

Take care,

Coby

---

**From:** Sotelo, Anjello <[ASotelo@elsegundo.org](mailto:ASotelo@elsegundo.org)>  
**Sent:** Tuesday, January 12, 2021 4:26 PM  
**To:** [equintanilla@lawa.org](mailto:equintanilla@lawa.org)  
**Cc:** Mitnick, Scott <[smitnick@elsegundo.org](mailto:smitnick@elsegundo.org)>; Hensley, Mark <[mhensley@hensleylawgroup.com](mailto:mhensley@hensleylawgroup.com)>; Sassoon, Elias <[esassoon@elsegundo.org](mailto:esassoon@elsegundo.org)>; Osa Wolff <[wolff@smwlaw.com](mailto:wolff@smwlaw.com)>; BRICKER, SAMANTHA <[SBRICKER@lawa.org](mailto:SBRICKER@lawa.org)>; Joseph D. Petta <[petta@smwlaw.com](mailto:petta@smwlaw.com)>; Coby King <[coby@hpstrat.com](mailto:coby@hpstrat.com)>  
**Subject:** 2nd Request to Extend Deadline for Public Comment re: LAX ATMP DEIR

[City Council b'ccd]

The attached document is being sent on behalf of El Segundo City Manager, Scott Mitnick.

Thank you,

**Anjello Sotelo | Executive Assistant to the City Manager**  
City of El Segundo  
350 Main Street El Segundo CA 90245  
310.524.2303 | [asotelo@elsegundo.org](mailto:asotelo@elsegundo.org) | [www.elsegundo.org](http://www.elsegundo.org)

CITY OF  
**EL SEGUNDO**



## Neighborhood Council of Westchester Playa

8726 South Sepulveda Boulevard, PMB 191A Los Angeles, CA 90045  
213.473.7023 ph • 310.301.3564 fx  
email: [inquiries@ncwpdr.org](mailto:inquiries@ncwpdr.org) • [www.ncwpdr.org](http://www.ncwpdr.org)



January 4, 2021

Mr. Justin Erbacci  
Chief Executive Officer  
Los Angeles World Airport  
P.O. Box 92216  
Los Angeles, California, 90009-2216

Reference: Airfield & Terminal Modernization Project

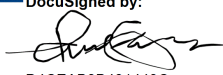
The Neighborhood Council of Westchester Playa would like to formally request an additional 60-day extension for comments to the LAWA ATMP DEIR. The current deadline is February 12, 2020 and this requested extension would move the deadline to April 12, 2020.

The complexity and size of the document (over 10,000 pages) warrants more time. The impact of the project on Air Quality, Greenhouse Gas Emissions, Noise and Transportation/Traffic will result in "Significant Unavoidable Impacts" and as such we have requested from the LADOT and the Planning Department help in reviewing the data.

We are awaiting input from the DOT and Planning and do not anticipate it in time for us to evaluate the input and make a timely recommendation to the Board in order to meet the current DEIR deadline of February 12, 2020.

Further, a non-CEQA review between LAWA and LADOT is in the works and may shed more light on potential additional mitigation strategies to reduce the project's negative impact on transportation traffic to the community.

Respectfully,

DocuSigned by:  
  
D4CEAB9B491449C...

Paula Gerez  
NCWP President

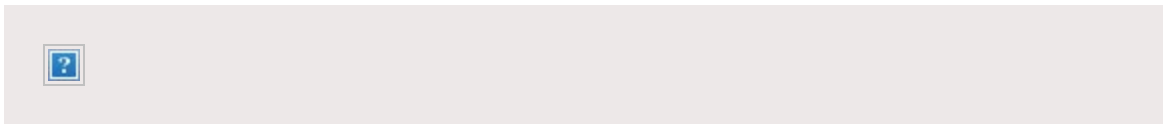
CC:

Ms. Evelyn Quintanilla, Los Angeles World Airports  
Councilmember Mike Bonin, [mike.bonin@lacity.org](mailto:mike.bonin@lacity.org)  
Geoff Thompson, LAX Community Liaison, [geoff.thompson@lacity.org](mailto:geoff.thompson@lacity.org)  
Chad Molnar, Chief of Staff, [chad.molnar@lacity.org](mailto:chad.molnar@lacity.org)

**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** FW: Addition to Our LAX Comment Form: Notification  
**Date:** Thursday, January 14, 2021 10:17:00 AM

FYI

**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Thursday, January 14, 2021 10:07 AM  
**To:** CRUZ, OHASSY C. <OCRUZ@lawa.org>  
**Subject:** Addition to Our LAX Comment Form: Notification



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

Changes since 1/14/21 10:05 AM

1 row added

1 row added or updated (shown in yellow)

Row 66

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 66  |
| <b>Full Name</b>     | Janet Lee PROFFITT  |
| <b>Company Name</b>  |   |
| <b>Email Address</b> | <a href="mailto:janetleeproffitt@yahoo.com">janetleeproffitt@yahoo.com</a>  |
| <b>Comments</b>      | I want to make a comment on the airport noise and DIRT. There is a thin black covering to my outdoor table overnight -- no way can you use it without first cleaning it off. I think we are breathing this in our lungs, and who knows what the damage is? It is far more important than the noise, although that is important too. It is VERY upsetting when the airport does NOT designate a plane ready to land and sends him over the city of El Segundo. I can EVEN see what airline it is they are so LOW!! They should NOT be allowed to fly over the city -- NO EXCEPTIONS. Send them over Marina del Rey, NOT El Segundo! We are now building a new house in El Segundo in the same spot that our old house was (built in 1949). Has anyone looked into the health consequences of breathing the dust (fine and large particulates) that jet engines use? I believe sincerely that they SHOULD. The SCAMD at the very least should look into it. |

|                |                   |
|----------------|-------------------|
| <b>Created</b> | 01/14/21 10:05 AM |
| <b>Project</b> | ATMP-Draft EIR    |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

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**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Sunday, January 31, 2021 9:40:08 PM



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

Changes since 1/31/21 9:37 PM

1 row added

1 row added or updated (shown in yellow)

Row 67

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 67   |
| <b>Full Name</b>     | ODonnell Iselin  |
| <b>Company Name</b>  |  |
| <b>Email Address</b> | sh12342004-shop@yahoo.com  |
| <b>Comments</b>      | This is a terrible plan. More gates and no increase in road capacity into the airport hub. No realistic public transportation alternatives. The appears to reduce and not increase the road capacity into the airport from the North and adds considerable length to the drive into the airport from self parking facilities. Today there are 2 entrances available directly from Sepulveda Boulevard. The new plan has one entrance roadway with 3 additional turns and a merging with Century Boulevard traffic at Airport Boulevard, which is already a busy intersection. A better plan would be to provide access from Pershing Drive and an extension of Imperial Highway. That would increase the road capacity into the terminal area. This plan decreases it. The construction period is going to be a tremendous mess. LAX is already ranked at the bottom of airport access among major US airports, and this plan will just add to the performance gap. I dread the construction start. This project will just make LA less livable and a more difficult place to do business. |
| <b>Created</b>       | 01/31/21 9:37 PM   |
| <b>Project</b>       | ATMP-Draft EIR   |

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**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Tuesday, February 9, 2021 9:59:32 AM



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

Changes since 2/9/21 9:57 AM


- 1 row added
- 1 attachment added

1 row added or updated (shown in yellow)

Row 68

|                      |                             |
|----------------------|-----------------------------|
| <b>Row ID</b>        | 68                          |
| <b>Full Name</b>     | Jessica Lall                |
| <b>Company Name</b>  | Central City Association    |
| <b>Email Address</b> | jlall@ccala.org             |
| <b>Comments</b>      | Please see attached letter. |
| <b>Created</b>       | 02/09/21 9:57 AM            |
| <b>Project</b>       | ATMP-Draft EIR              |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

 1 attachment added

 [2020 02 09 - LAWA - Letter of Support for LAX ATMP - CCA Letter.pdf](#)  
 (139k) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 68: Jessica Lall





February 9, 2021

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

**Re: Support for the LAX Airfield and Terminal Modernization Program**

Dear Ms. Quintanilla,

Established in 1924, Central City Association (CCA) is a membership organization representing over 300 businesses, non-profit organizations and trade associations that are committed to advancing policies and projects that enhance Downtown Los Angeles' vibrancy and increase investment in the region. **CCA supports projects that improve Los Angeles' regional economic infrastructure and global competitiveness, and we're pleased to offer our support for the LAX Airfield and Terminal Modernization Program (ATMP) with that in mind.**

LAX is our region's gateway to the world and is a vital link between our city and the global economy as millions of passengers and cargo tons pass through LAX each year. It is also the first experience that many visitors to Los Angeles have when they arrive and their last impression when they leave. It is paramount to ensure that LAX is a welcoming and highly efficient and functional airport. The ATMP is an important project to achieve that goal.

The ATMP will improve airfield operations and aircraft movement translating to less delays and greater safety. Terminal enhancements will also provide better passenger experience with more seating and concessions than the existing remote terminals, and greater convenience overall, especially with seamless connections between international and domestic flights. Importantly, the project's benefits extend beyond the site itself by promoting new local jobs and business opportunities during construction and operation. The ATMP also fosters a better environment for the surrounding community with reduced congestion and emissions and connections to the Automated People Mover.

CCA is a strong advocate for investing in infrastructure that drives the long-term economic health and sustainability of our region. We are excited for the ATMP and look forward to its implementation. Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads "J Lall". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Jessica Lall  
President & CEO,  
Central City Association of Los Angeles

**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** Fw: Addition to Our LAX Comment Form: Notification  
**Date:** Wednesday, February 24, 2021 3:26:47 PM

---

Hi James,  
FYI

---

**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Wednesday, February 24, 2021 3:20:13 PM  
**To:** CRUZ, OHASSY C.  
**Subject:** Addition to Our LAX Comment Form: Notification



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

Changes since 2/24/21 3:18 PM

- 1 row added
  - 1 attachment added
- 


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

Row 69

|                      |                       |
|----------------------|-----------------------|
| <b>Row ID</b>        | 69                    |
| <b>Full Name</b>     | David Anderson        |
| <b>Company Name</b>  | Chair LAX AAAC        |
| <b>Email Address</b> | david.anderson@aa.com |
| <b>Comments</b>      |                       |
| <b>Created</b>       | 02/24/21 3:18 PM      |
| <b>Project</b>       | ATMP-Draft EIR        |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

---

 1 attachment added

 [Draft ATMP EIR Response.docx \(120k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 69: David Anderson

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**From:** Anne Shea <a.shea@avairpros.com>  
**Sent:** Wednesday, February 24, 2021 3:26 PM  
**To:** BRICKER, SAMANTHA <SBRICKER@lawa.org>; QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>  
**Cc:** Lori Peters <l.peters@avairpros.com>; david.anderson@aa.com  
**Subject:** Draft ATMP EIR Response

Samantha and Evelyn, good afternoon. We hope that you are doing well.

We just wanted to let you know that the LAX AAAC comments have been submitted through the public comment portal, but thought that a copy might be helpful for you as well.

Please let us know if you have any questions or would like to discuss.

Many thanks, please take care and enjoy the evening.

Anne

---

**MEMORANDUM**

**Date:** February 24, 2021

**To:** Samantha Bricker - LAWA

**From:** Lori Peters – Airline Liaison Office (ALO)

**cc:** David Anderson – AAAC Chairperson

**Subject:** ATMP Draft EIR Response

---

The Airline Liaison Office (ALO) and the AAAC have reviewed the draft ATMP EIR and would like to take this opportunity to provide feedback for your consideration. The LAX airline community appreciates the thoroughness and detail of the report shared and applauds the environmental efforts.

A concern that has surfaced which we would like to bring to your attention is related to loss of “space” that is currently used by the airlines and for which there is no apparent plan to replace. As identified on Table 2-4, the space concerns include:

1. AA and UA aircraft parking (T9 Site) (page 2-65)
2. LAWA operations aircraft parking (T9 Site) (page 2-66)
3. Impact on LAXFUEL current and future potential needs (page 2-63)
4. A portion of AA cargo staging space (Twy C Extension) (page 2-65)

As you may be aware, sufficient aircraft parking space has been a challenge at LAX for an extended period of time and the proposal to reduce space has the potential to limit future activity. As airlines plan their network flight schedules, particularly those who operate in either a hub-spoke structure and/or with slot/curfew restrictions, access to RON or extended aircraft rest space can be a critical factor when deciding what flights may or may not be offered at a particular destination. As plans are further refined, the AAAC strongly encourages LAWA to seriously consider alternate uses of space to preserve and create aircraft parking areas.

Regarding space for LAXFUEL, the airline community would like to ensure that sufficient land, facilities, and other infrastructure is available for operations at time of construction as well as capacity for any forecasted future needs. Has there been an assessment of what needs might be associated with operational activity in future years?

Finally, volume at the American Airlines cargo staging area often exceeds capacity today. Further reduction in space would place limitations on how much cargo could be processed through the facility. Have alternatives been considered to retain an equivalent amount of space for cargo staging?

The LAX airlines look forward to speaking further with LAWA regarding possible alternatives to preserve critical operational space while moving forward with the ambitious vision for LAX.

From: [FABIAN RAYGOSA](#) via Smartsheet  
 To: [CRUZ, DHASSY C.](#)  
 Subject: Addition to Our LAX Comment Form: Notification  
 Date: Friday, March 5, 2021 3:34:09 PM



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

Changes since 3/5/21 3:32 PM

2 rows added

2 rows added or updated (shown in yellow)

| Row ID | Full Name      | Company Name        | Email Address                      | Comments  | Created          | Project        |
|--------|----------------|---------------------|------------------------------------|---|------------------|----------------|
| 71     | Enrique Gaytan | LAXFUEL Corporation | enrique.gaytan@menziesaviation.com | The current Draft ATMP EIR does not include the expansion of the current on-airport fuel facility at LAX. LAXFUEL requires additional on-airport fuel storage to allow for both Concourse 0 and Terminal 9 to be supported for future operations.   | 03/05/21 3:32 PM | ATMP-Draft EIR |
| 72     | Enrique Gaytan | LAXFUEL Corporation | enrique.gaytan@menziesaviation.com | The planned expansion of Taxiway D displaces a portion of the existing fuel facility lease hold which is necessary to maintain current operations at the airport. These displaced facilities include a refueler loading facility and hydrant cart test stand as well as equipment laydown for ongoing maintenance and construction activities. LAXFUEL will require additional space to construct a replacement refueler loading facility on the Airport Operations Area (AOA) and hydrant cart test stand for testing and calibrating refueling equipment. | 03/05/21 3:33 PM | ATMP-Draft EIR |

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---

**From:** Dennis Miller <[ncwpboard11@gmail.com](mailto:ncwpboard11@gmail.com)>  
**Sent:** Sunday, November 29, 2020 10:40 AM  
**To:** Sparling, Daniel C. <[sparlingdc@cdsmith.com](mailto:sparlingdc@cdsmith.com)>  
**Subject:** Questions

I read the the "**LAX Airfield and Terminal Modernization Project Draft EIR**"

I keep coming back to the traffic, are they looking at the traffic around the airport? I see congestion on neighborhood streets but how do you report the problems, and who do you report the problem when the city is trying to make street lanes, one or two lanes.

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

Noise: I hear the airplanes from my neighborhood, most of the noise is airplanes taking off noise. .

Best Wishes

--

Dennis Miller

NCWP Board Member  
Residential District 11

[Do you really need to print this e-mail?](#)

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**From:** Jane Martin <[jane.martin@seiu-usww.org](mailto:jane.martin@seiu-usww.org)>  
**Sent:** Monday, November 30, 2020 3:11 PM  
**To:** Sparling, Daniel C. <[sparlingdc@cdmsmith.com](mailto:sparlingdc@cdmsmith.com)>  
**Subject:** QUESTION TO SUBMIT FOR LAX Airfield and Terminal Modernization Project Draft EIR Virtual Public Meeting

here is the question I would like to submit:

What plans does LAWA have to work with the city to convene a community benefits process to mitigate impact on workers and surrounding neighborhoods including housing, displacement, traffic, public transit, good jobs and the environmental health impacts of such a large expansion?

Thank you for registering for "LAX Airfield and Terminal Modernization Project Draft EIR Virtual Public Meeting".

Please submit any questions to: [sparlingdc@cdmsmith.com](mailto:sparlingdc@cdmsmith.com)

--

---

*Jane Martin*  
*office (510) 437 8131*  
*cell (415) 947 9284*  
*Airport Division Director*  
*SEIU USWW*  
[www.seiu-usww.org](http://www.seiu-usww.org)



---

**From:** Cynthia Kellman <cpk@cbcearthlaw.com>

**Sent:** Monday, January 11, 2021 2:44 PM

**To:** ERBACCI, JUSTIN <JERBACCI@lawa.org>; TRACY, SUZANNE (CITY) <STRACY@lawa.org>;  
QUINTANILLA, EVELYN Y. <EQuintanilla@lawa.org>

**Cc:** Doug Carstens <dpc@cbcearthlaw.com>; Denny Schneider <Denny@welivefree.com>; Robert  
Acherman <robertacherman@aol.com>

**Subject:** Request for 60 Day Extension of Comment Period for Airfield and Terminal Modernization  
Plan (ATMP) Draft Environmental Impact Report (State Clearinghouse No. 2019049020)

Dear Mr. Erbacci,

Attached please find a letter from Douglas Carstens regarding the above-captioned  
subject.

Please feel free to contact me with any questions or concerns.

Cynthia Kellman  
CHATTEN-BROWN, CARSTENS & MINTEER LLP  
2200 Pacific Coast Highway, Ste. 318  
Hermosa Beach, CA 90254  
Tel: 310-798-2400 x6  
Fax: 310-798-2402  
[cpk@cbcearthlaw.com](mailto:cpk@cbcearthlaw.com)  
[www.cbcearthlaw.com](http://www.cbcearthlaw.com)



## Chatten-Brown, Carstens & Minter LLP

Hermosa Beach Office  
310-798-2400

San Diego Office  
(858) 999-0070  
(619) 940-4522

2200 Pacific Coast Highway, Ste. 318  
Hermosa Beach, CA 90254  
[www.cbcearthlaw.com](http://www.cbcearthlaw.com)

Douglas P. Carstens  
Email Address:  
[dpc@cbcearthlaw.com](mailto:dpc@cbcearthlaw.com)  
Direct Dial:  
310-798-2400 x 1

January 11, 2021

Mr. Justin Erbacci  
Chief Executive Officer  
Los Angeles World Airports  
P.O. Box 92216  
Los Angeles, California, 90009-2216  
Email: [jerbacci@lawa.org](mailto:jerbacci@lawa.org)

Re: Request for 60 Day Extension of Comment Period for Airfield and  
Terminal Modernization Plan (ATMP) Draft Environmental Impact Report  
(State Clearinghouse No. 2019049020)

Dear Mr. Erbacci:

In the informal discussions of the Alliance for a Regional Solution to Airport Congestion (ARSAC) with you to resolve differences with our 2016 Memorandum of Understanding (MOU) and this group of projects, ARSAC is learning details of the ATMP project that impact our review of the draft environmental impact report (EIR).

To complete our mutual efforts to resolve issues and to provide appropriate comments we are requesting a 60-day extension to the comment period for the draft EIR.

We look forward to hearing from you at your earliest convenience.

Sincerely,

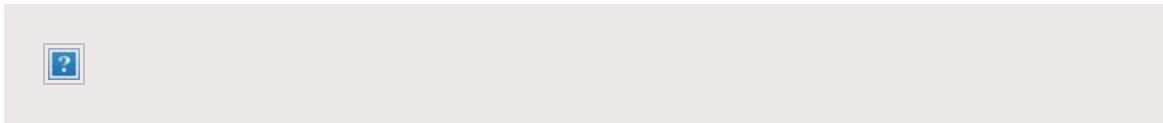
A handwritten signature in blue ink that reads 'Douglas P. Carstens'.

Douglas P. Carstens

cc: Suzanne Tracy, Deputy City Attorney, [stracy@lawa.org](mailto:stracy@lawa.org)  
Evelyn Quintanilla, Chief of Airport Planning II, [EQuintanilla@lawa.org](mailto:EQuintanilla@lawa.org)

**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** Fw: Addition to Our LAX Comment Form: Notification  
**Date:** Friday, March 12, 2021 3:48:57 PM

**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Friday, March 12, 2021 3:39:06 PM  
**To:** CRUZ, OHASSY C.  
**Subject:** Addition to Our LAX Comment Form: Notification



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

Changes since 3/12/21 3:37 PM


- 1 row added
- 1 attachment added

1 row added or updated (shown in yellow)

Row 74

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 74  |
| <b>Full Name</b>     | Lloyd W. Landreth   |
| <b>Company Name</b>  | Landreth Law Firm PLC   |
| <b>Email Address</b> | llandreth@landrethlaw.com   |
| <b>Comments</b>      | Los Angeles West Terminal Fuel Corporation (LAWTFC) submits the attached comments to the Draft Environmental Impact Report for the LAX Airfield and Terminal Modernization Project. These comments have been contemporaneously submitted for review in hard copy by USPS Priority Mail service. |
| <b>Created</b>       | 03/12/21 3:37 PM  |
| <b>Project</b>       | ATMP-Draft EIR  |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

 1 attachment added

 [LAWTFC Comments to Draft EIR for ATMP 03122021.pdf \(1M\)](#) added by web-

[form@smartsheet.com](mailto:form@smartsheet.com) on Row 74: Lloyd W. Landreth

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March 12, 2021

*Via USPS Priority Mail and Electronic Submission*

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

RE: WRITTEN COMMENTS OF LOS ANGELES WEST TERMINAL FUEL CORPORATION (LAWTFC) ON DRAFT ENVIRONMENTAL IMPACT REPORT (EIR) FOR THE LAX AIRFIELD AND TERMINAL MODERNIZATION PROJECT

Dear Ms. Quintanilla:

Los Angeles West Terminal Fuel Corporation (LAWTFC), under License Agreements with Los Angeles World Airports (LAWA), is the International Airline Fuel Consortium tenant at Los Angeles International Airport (LAX). LAWTFC provides specialized passenger and cargo aircraft fueling services and equipment to its 42 member airlines and 17 non-member airlines at LAX. LAWTFC is the only fuel supply and provisioning source to this significant segment of all air traffic at LAX. Approximately one-half of the fuel volume supplied to all airlines using LAX is derived from the services of LAWTFC. Using pre-COVID statistics by way of example, in 2019 LAWTFC was responsible for supplying 3.2-million gallons of fuel per day, which accounted for 47% of the total annual fuel used by all aircraft at LAX.

LAWTFC has reviewed LAWA's publicly available documents related to the Airfield & Terminal Modernization Project (ATMP) and the associated Draft Environmental Impact Report (DEIR). More specifically, the focus of these comments by LAWTFC is on two portions of the ATMP, namely the Taxiway D project and the Concourse 0 & Terminal 9 fueling under the ATMP. Measurable harm to international passenger and cargo airline fueling services at LAX will result if the proposed ATMP Taxiway D project and Concourse 0 and Terminal 9 were to proceed as planned. There is no indication in the Draft EIR that LAWA considered the impacts of increased AOA traffic congestion, increased greenhouse gas emissions, increased potential for fueling-related spills, and impacts on flight schedules as a direct result of the projects defined in the DEIR. LAWTFC submits the following comments in the interest of working with LAWA toward appropriate mitigation.

**DEIR Comments: Please Reference LAWTFC EXHIBIT 1**

1. LAWTFC maintains and operates two 12-inch distribution fuel-supply lines and the West Remote Gates' hydrant fueling system they serve. The West Remote Gates are a critical boarding area for LAX during normal operations (pre-COVID) and have been utilized by LAWA during COVID to provide flexibility for enplanement of various passenger groups arriving and departing from LAX. The Taxiway D project, as planned, appears to eliminate the source of fuel to aircraft using the West Remote Gates by requiring abandonment of the two 12" distribution fuel-supply mains. [DEIR p. 2-20 §2.4.1.1; DEIR p. 2-38 §2.4.2.3]

Since LAWA plans for flights to continue to be served from the West Remote positions after the two 12" fuel lines are removed from service [DEIR p. 2-20 §2.4.1.1; DEIR p. 2-38 §2.4.2.3], the only source of fuel would be large-format 9,200-gallon (net volume) tanker trucks (refuelers). These trucks are not currently available to LAWA or LAWTFC, and must be purchased, custom built, and then supported with a suitable overnight parking area that must provide general spill

Evelyn Quintanilla  
March 12, 2021  
Page 2

containment that is not identified anywhere in the Enabling Projects outlined in the DEIR [DEIR pp. 2-61 to 2-75, §2.5.1].

These refuelers exceed 14,100 lbs. each and are powered by diesel engines because of their size, operating durations and other factors, including weight that increase pollutant emissions. In addition to the increased greenhouse gas emissions resulting from trucking fuel to the West Remote Gates, these refuelers will impose additional vehicle traffic burdens on the already-congested AOA vehicle roadways. Trucking fuel also represents a potential for fuel releases to the environment, which the transport of fuel via distribution mains and West Remote Gate hydrant fueling systems significantly reduces the risk of release and furthermore will not conform to the stated goal listed in Section 2.4.5 Sustainability, (DEIR p. 2-59) 'LAWA would incorporate sustainability features into the proposed Project'. Table 2-3 (DEIR p.2-60) states that 'Ground Support Equipment Operations' shall meet the goal to 'reduce pollutant emissions.'

Relevant West Remote Gates' statistics include: 18 parking positions that are all suited to ADG Group V aircraft (and one of the 18 was modified to suit Group VI as well). For 2019, the daily averages for aircraft flights served and fuel uplifted at the West Remotes were found from a review of fueling records and general operational averages that are available to LAWTFC and to LAWA. The total number of flights (aircraft) that took fuel at the West Remotes in 2019 was 4,255 according to the fueling operator Menzies Aviation. That equates to about 354 flights per month. Of these flights, the approximate percentages - by aircraft-family - were estimated at 1% for A380's = 3 per month, 4% for B74X = 14 per month, 70% for B77X = 248 per month, 9% for B787 = 32 per month and the remaining 16% were either A33X or A34X = 57 per month.

Menzies, the fuel system and into-plane operator, also notes that average fuel uplifts - by aircraft family - are well established for the West Remotes and the number of 9,200-gallon refueler deliveries per flight can be established thereby: A380 (average fuel-lift per flight = 46,000 gallons needing 5 refuelers); 74X (average lift per flight = 42,000 gallons needing 5 refuelers); 77X (average lift per flight = 30,000 gallons needing 4 refuelers); 787 (average lift per flight = 23,000 gallons needing 3 refuelers); A33X/A34X (average lift per flight = 23,000 gallons needing 3 refuelers).

Since the DEIR does not establish where the north refueler loading rack will be moved to during or before Taxiway D is extended within the Enabling Projects outlined in the DEIR [DEIR p. 2-63], it is not possible to estimate the miles the refuelers (tankers) will travel on a monthly basis, but the average number of refueler trips per month is approximately 1,344 per month, requiring an average of 45 refueler trips per day. Depending on the distance this could require from 5 to 7 new diesel refuelers traveling non-stop over already-congested AOA vehicle roadways.

Despite the direct and measurable environmental, social and economic impacts, LAWTFC has never been contacted to discuss relocating, altering, maintaining or replacing the two distribution mains and the hydrant system. LAWTFC should have been consulted to avoid these impacts, but instead, the Schedule published in Fig 2-28 on p. 2-79 of the DEIR indicates that enabling projects do not start earlier than the westward extension of Taxiway D, so it is clear that the ATMP planned work and schedule related to Taxiway D must be revised to preserve the two distribution mains in their current location, or to relocate the two distribution mains in a planned manner which allows continued use of the West Remote Gate hydrant system both during and after ATMP construction

projects to serve the hard-stand parking identified by Enabling Projects outlined in the DEIR [DEIR p. 2-63, Item 2, indicating that 9 positions for fueling will remain in use by redirected flights].

2. According to the EIR documents for the ATMP, elimination of the fueling system at the West Remote gates will occur very early in the construction of the proposed Taxiway D (T/W D) program. [DEIR p. 2-38 §2.4.2.3] If LAWA had anticipated using the proposed Concourse 0 and Terminal 9 as locations to move the West Remote Gates flights, the timing will not work. Because LAWA cannot commit to airlines that rely on the West Remote Gates that LAWA has alternative boarding area and fueling locations, this gap in use of the West Remote Gates would have the direct result of significant congestion in the existing Terminal areas, increased refueler truck use and increased passenger vehicle use, all causing increased greenhouse gas emissions due to vehicular/truck traffic. The ATMP work related to Taxiway D and the West Remote Gates has the irreparable outcome of preventing a safe and environmentally-sound supply of fuel to the West Remote Gates and must be modified to address these impacts.
3. The LAWTFC fuel system manifold for the West Remote Gates hydrant system is located in the northwest corner of the LAXFUEL 'north' loading rack facility. Based on LAWA's ATMP project documents, the proposed Taxiway D extension will traverse through this area. A new single 12-inch fuel main is not likely to be sufficient during peak fueling periods, so a single 14-inch fuel distribution main could be extended to the existing hydrant fueling mains at the West Remotes from the LAXFUEL leasehold area. The potential route could be along the path of the planned service drive south of Taxiway D. The DEIR must address the impacts within the schedule on page 2-79, Figure 2-28 to adequately address LAWTFC's fuel manifold, and the north refueler loading rack facility must also be relocated in an area yet to be identified by the DEIR [DEIR p. 2-63, Table 2-4, item 6]. Adding more refuelers to serve the West Remotes, while reducing truck loading facilities simultaneously will lead to increased flight delays and air emissions along with negative impacts to passenger experience. Relocating the north loading racks anywhere east or south of the existing north loading racks' current location cannot be considered since these areas will negatively impact the needs of LAXFUEL as identified in their comments and LAWTFC's operations area used for charging the electric carts, maintenance and operations, and over-night parking of a limited number of refuelers.
4. The DEIR asserts that LAWA intends to replace 15 of the 18 West Remote Gates with new contact gates located at the proposed Concourse 0 and Terminal 9. [DEIR p. 2-20 §2.4.1.1; DEIR p. 2-38 §2.4.2.3] However, LAWTFC notes that 9 positions will remain and these have hydrant fueling capability. How does LAWA intend to fuel these remaining 9 West Remote positions (including the 3 Gated positions) into the future? See [DEIR p. 2-38 §2.4.2.3] If these remaining positions are re-purposed for itinerant flights and other aircraft as the DEIR suggests, what mitigation measures has LAWA established to refuel these aircraft? `Delivery of fuel by refueler trucks is one option, but as noted in prior comments, this option requires an accessible truck loading area, increases AOA vehicle traffic, and causes more greenhouse gas emissions.
5. In support of LAWA's stated goal on Table 2-3 to 'reduce vehicle emissions' listed in Section 2.4.5 Sustainability, page 2-59, 'LAWA would incorporate sustainability features into the proposed Project', LAWTFC operates (32) electric hydrant carts (the world's largest fleet of electric hydrant fueling carts) that move fuel from the hydrant fueling system into the airplane. Both Concourse 0 and Terminal 9 are too far from the existing LAWTFC leasehold (see LAWTFC EXHIBIT 1) to allow the LAWTFC electric carts to travel to and from the new gate areas and effectively fuel more

Evelyn Quintanilla  
March 12, 2021  
Page 4

than just a few flights at the new buildings before they will be forced to recharge. The DEIR does not describe any means or methods for charging carts at Concourse 0 and Terminal 9 within the planning drawings provided within Section 2 of the DEIR and does not list charging stations for these critical GSE units under the Table 2-3 on DEIR p. 2-60 within the Sustainability Feature 'Ground Support Equipment Operations.' Fueling of airplanes at Concourse 0 and Terminal 9 cannot occur without provisions for cart charging areas of substantial size. Unless electric carts are adequately planned for, gasoline or diesel driven carts will have to serve these proposed replacement gates, significantly increasing greenhouse gas emissions.



Typical LAWTFC Electric rechargeable hydrant fueling cart.

If you have any questions, please feel free to contact me at (918) 296-0460 or by email at [llandreth@landrethlaw.com](mailto:llandreth@landrethlaw.com).

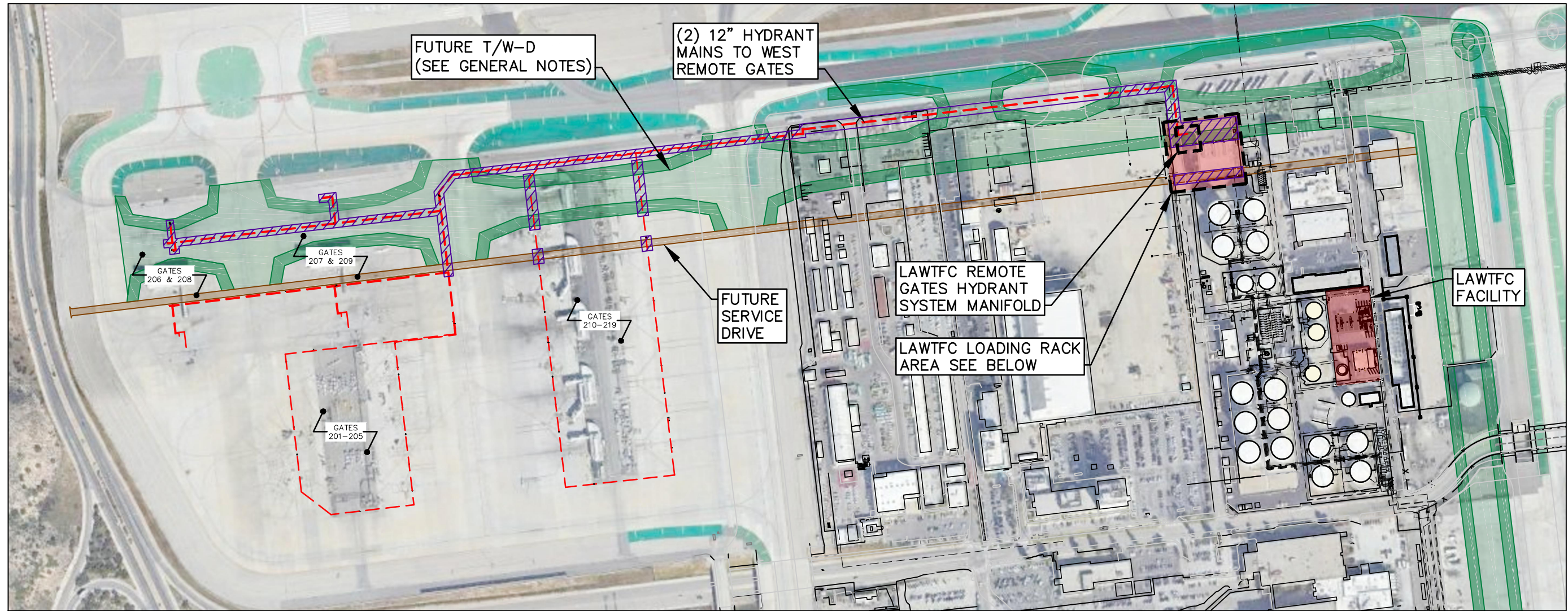
Sincerely,

LANDRETH LAW FIRM, PLC

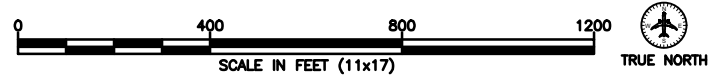
A handwritten signature in black ink, reading "Lloyd W. Landreth".




Lloyd W. Landreth  
801 East B Street  
Jenks, Oklahoma 74037-4307  
Phone: 918-296-0460  
Email: [llandreth@landrethlaw.com](mailto:llandreth@landrethlaw.com)





# LAWTFC EXHIBIT 1



| LEGEND  |                               |
|---|-------------------------------|
|  | PROPOSED T/W-D (60% DESIGNED) |
|  | PROPOSED SERVICE DRIVE        |
|  | IMPACTED FUEL SYSTEM          |



LAWTFC NORTH LOADING RACK



**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Saturday, March 13, 2021 2:31:58 PM



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Changes since 3/13/21 2:29 PM


- 1 row added
- 1 attachment added

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

Row 76

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 76  |
| <b>Full Name</b>     | Paula Gerez   |
| <b>Company Name</b>  | NCWP  |
| <b>Email Address</b> | paula.ncwpdr@gmail.com  |
| <b>Comments</b>      | Greetings Ms. Quintanilla, The Neighborhood Council of Westchester Playa has reviewed the DEIR for the Airfield and Terminal Modernization Project and has concluded that the project as currently presented poses grave adverse strain to the community and our quality of life. I have attached our formal response for your use. Respectfully, Paula Gerez, NCWP President |
| <b>Created</b>       | 03/13/21 2:29 PM  |
| <b>Project</b>       | ATMP-Draft EIR  |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

 1 attachment added

 [ATMP\\_DEIR\\_Response.NCWP.pdf \(458k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 76: Paula Gerez



## Neighborhood Council of Westchester Playa

8726 South Sepulveda Boulevard, PMB 191A Los Angeles, CA 90045  
213.473.7023 ph • 310.301.3564 fx  
email: [inquiries@ncwpdr.org](mailto:inquiries@ncwpdr.org) • [www.ncwpdr.org](http://www.ncwpdr.org)



March 2, 2021

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

Dear Ms. Quintanilla,

The Neighborhood Council of Westchester Playa has reviewed the DEIR for the Airfield and Terminal Modernization Project and has concluded that the project as currently presented poses grave adverse strain to the community and our quality of life. The combination of two distinct projects – Airfield Safety Modernization and the Terminal Expansion of adding two new terminals 0 and 9 – has given the incorrect impression that the entire project is about modernization. The project should be broken apart into two distinct projects- Airfield Modernization and Adding New Gates via Terminal Expansion. While we are supportive of the Airfield Modernization portion of the project, we are not in favor of Terminal Expansion. As such, the NCWP will not support the project as currently configured.

The various projects presented should be properly bifurcated and reintroduced individually for closer inspection of individual environmental and traffic impact data, consideration and to allow for oversight as “parts of the whole”.

In addition, this DEIR report exposes a potential serious overreach by LAWA. We have reached the point in which LAWA could be violating the “Spirit” of existing non-expansion agreements currently in place. Unfortunately, the bottom line is the DEIR reflects capacity and gate increases openly.

Our concerns are centered on the following areas – Air Quality; Greenhouse Gas Emissions; Noise; and Transportation Congestion. Proposed mitigation is not enough to overcome the determination of “Significant and Unavoidable” impacts to several key environmental measurements caused by the project. Environmental concern for Air Quality, Greenhouse Gas, Aircraft Noise and Transportation will be significant even after mitigation. The community will be exposed to these adverse impacts every day. For more detailed information, please refer to DEIR pages 1-24 and 1-25. We believe that most of the Air Quality increases will exceed guidelines from the SCAQMD.

Also, the new CEQA VMT (Vehicle Miles Traveled) calculations show significant increases that will directly increase traffic congestion around Westchester Playa. Total passenger VMT for 2019 was 6,581,811 and the 2028 forecast is 8,709,995 – a 32%

increase in miles traveled. This translates to total airport daily trip generation to and from the airport will go from 316,128 in 2019 to 407,942 in 2028 – a 29% increase in daily trips. With no mitigation, this will create significant traffic in our neighborhoods. And this is after LAMP will have been operational for 5 years.

Our other concerns are –

-MAP projections show a **30% increase in passenger count from 84.56 M in 2017 to 110.8M in 2028**. Further, annual aircraft operations will increase from **715,000 in FY2018 to 800,000 in FY2028**.

- The Midfield Satellite Concourse North added 12 north gates and has yet to be put into service. An additional 8 south gates will be constructed in the next few years at the already approved Midfield Satellite Concourse South. Further, it appears that the MSC EIR already took credit for a reduction in Western concourse gates (see MSC EIR). Therefore, the AMTP DEIR should be evaluated as **a gate increase of 18-27 new gates**.

- Specific Objectives of the Project cover Airfield improvement, Terminal improvements, Roadway System Improvements and Additional Objectives but **fails to cover any specific improvements to our community** which will bear the brunt of 26.24 M additional passengers and a significant 91,814 additional increase airport trips.

-**No increase in Public Services**.

-**No specific improvements to traffic intersections within the community**.

-**No penalties/fines if proposed mitigation does not reduce negative environmental impacts**

We believe that a CEQA EIR should not be based on providing the minimum mitigation needed for approval. But should be a forward-looking document on how “best” to balance the positive integration of a project into a community. And as such, here are items that we feel need to be added for us to re-consider our decision –

- Split the proposed project into two separate projects with separate EIR analysis for each project.
- VMT forecasts need to be monitored yearly with **penalties assessed for not meeting forecast reductions**. The penalties would go directly to mitigating traffic problems in the Westchester Playa community.
- Specific improvements to various streets and intersections -Sepulveda and Lincoln; Airport Boulevard between Arbor Vitae and La Tijera Boulevard; Aviation Boulevard between 111<sup>th</sup> Street and Century Boulevard; Aviation Boulevard between Arbor Vitae and La Cienega.

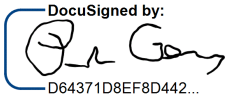
- Direct new roadways to the ITF-West to increase usage of LAMP and avoid the proposed left turn back up on Sepulveda
- Guarantee adoption and funding for LADOT non-CEQA traffic improvement and reduction recommendations from the upcoming report being analyzed based on DEIR traffic data.

In closing, The Neighborhood Council of Westchester Playa [NCWP] understands the importance of a safe, modern and efficient “world class airport”. And equally understands the needs of our residents to be protected from the unmitigated negative impacts of expanding airport operations. Unfortunately, the data poses tremendous unmitigated impacts and concerns to our neighborhood –

- LAX flight operations growing to 800,000 flights in 2028 from 715,000 in FY 2018.
- Construction of 2 new terminals with 18 to 27 gates combined
- Passenger increase to 110.8 million by 2018 (a 30 % increase over today) and increasing to 128 million by 2045 and
- Significant unavoidable environmental impacts to air quality, greenhouse gas emissions, noise and transportation
- No community benefits

We need to work together in making Los Angeles and all of California the best place to visit or live. We want LAX to be a “world class airport and a **first class neighbor**”. While we are supportive of the Airfield Modernization portion of the project, we are not in favor of Terminal Expansion. As such, the NCWP will not support the project as currently configured. The NCWP board is happy to reconsider our position if during the legislative approval process significantly more community benefits are included in the project.

Respectfully,

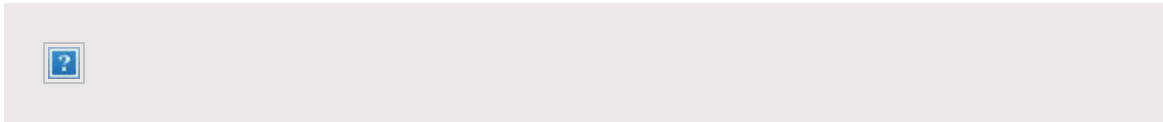
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D64371D8EF8D442...  
Paula Gerez, NCWP President

cc: Mike Bonin, CD 11 Councilmember

**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** FW: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 12:07:51 PM

**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Monday, March 15, 2021 12:03 PM  
**To:** CRUZ, OHASSY C. <OCRUZ@lawa.org>  
**Subject:** Addition to Our LAX Comment Form: Notification



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Changes since 3/15/21 12:00 PM

1 row added

1 row added or updated (shown in yellow)

Row 81

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 81  |
| <b>Full Name</b>     | ARMANDO MUNOZ   |
| <b>Company Name</b>  | SEIU USWW member  |
| <b>Email Address</b> | <a href="mailto:eccmunoz@gmail.com">eccmunoz@gmail.com</a>  |
| <b>Comments</b>      | News has gone around thru LA that this huge expansion is being proposed, but what about the workers at LAX? the cabin cleaners that clean body fluids nobody would want to touch? bag runners that work overtime to afford their college tuition? passenger service agent who can barely pay their bills because our hours are cut? In the 11 years I have worked at this airport, LAX has not prioritized workers. I started at 9 dollars an hour and at one time I had to live in my car because I couldn't afford my mortgage, we were able to win better wages by getting involved with the union. With COVID I was about be in the same situation before the CARES acts passed, but things haven't changed. Unemployment isn't going to last forever. Another you may not know is that LAX workers don't have any retirement, even workers who have been working 30 years at the airport, many work past retirement age because they can't afford to retire. Rents are so high now in LA. If you are going all out on expanding, then you need to go all out supporting LAX workers as well. |

|                |                   |
|----------------|-------------------|
|                | Thank you.        |
| <b>Created</b> | 03/15/21 12:00 PM |
| <b>Project</b> | ATMP-Draft EIR    |

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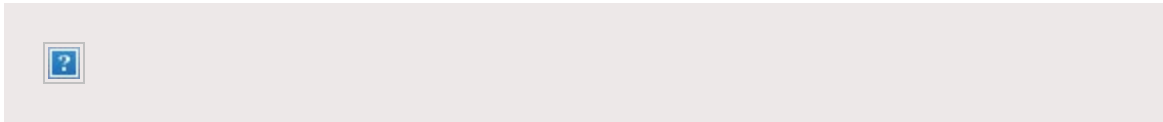
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**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** FW: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 4:19:12 PM

**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Monday, March 15, 2021 4:17 PM  
**To:** CRUZ, OHASSY C. <OCRUZ@lawa.org>  
**Subject:** Addition to Our LAX Comment Form: Notification



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Changes since 3/15/21 4:14 PM

1 row added

1 row added or updated (shown in yellow)

Row 86

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 86   |
| <b>Full Name</b>     | Brian Clark  |
| <b>Company Name</b>  | ucla   |
| <b>Email Address</b> | <a href="mailto: mrbriandclark@gmail.com">mrbriandclark@gmail.com</a>  |
| <b>Comments</b>      | No new gates or expansion to LAX. The surrounding neighborhoods are already unlivable because of noise and pollution. The people on the ground matter. Not to the FAA or to LAWA but they matter. Find a way to get quiet non-polluting airplanes instead. ENOUGH! |
| <b>Created</b>       | 03/15/21 4:14 PM   |
| <b>Project</b>       | ATMP-Draft EIR   |

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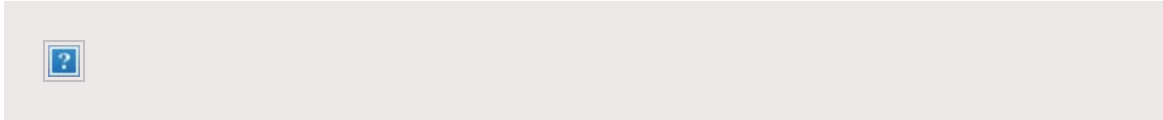
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**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** FW: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 1:05:44 PM

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**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Monday, March 15, 2021 12:59 PM  
**To:** CRUZ, OHASSY C. <OCRUZ@lawa.org>  
**Subject:** Addition to Our LAX Comment Form: Notification



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Changes since 3/15/21 12:56 PM

- 1 row added
  - 1 attachment added
- 


1 row added or updated (shown in yellow)

Row 82

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 82   |
| <b>Full Name</b>     | Debi Wagner  |
| <b>Company Name</b>  |  |
| <b>Email Address</b> | <a href="mailto:debi.wagner@icloud.com">debi.wagner@icloud.com</a> |
| <b>Comments</b>      |  |
| <b>Created</b>       | 03/15/21 12:56 PM  |
| <b>Project</b>       | ATMP-Draft EIR   |

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 1 attachment added

 [Draft EIR for LAX comments 15Mar2021.docx \(18k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

on Row 82: Debi Wagner

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I am submitting these comments on behalf of myself, a private citizen.

The purpose of the project appears to be enhancing safety and efficiency. These terms are much better understood as: Increasing peak hourly aircraft throughput without exceeding acceptable safety risk.

The purpose of adding gates is to increase hourly availability which increases operational throughput. The potential turnover at a gate is on average, one aircraft per hour. Adding 3-12 gates can increase throughput by 85,000 operations per year. This figure mirrors the projected growth in 2018 to 2028, the planning years for baseline and future scenario. This number of aircraft will produce above de-minimus levels of annual tons per year emissions for criteria pollutants of concern, NO<sub>x</sub>, VOC, SO<sub>x</sub> and PM 10, 2.5. Because the area is in non-attainment for several criteria pollutants of concern, increasing emissions DOES pose a health risk. When de-minimus levels are exceeded, regardless of the SIP emissions inventory, and when potential exceedances of the federal standards exist or are worsened as a result of the project, potentially causing delay to attainment, federal agencies such as the FAA are prohibited from funding, supporting or approving those projects. The preliminary conformity determination admits these potential inventory and exceedance conditions are present but claims the significance is unavoidable. It would be critical to know if existing configuration and number of gates precludes the safe incremental increased operations. This used to be called max capacity. There is a theoretical maximum capacity of the existing airport. Once max capacity is reached, a cap is placed on adding any more operations. That maximum number is based on peak hour/day arrival.

The statement that impacts do not “move the dial” with regard to regional human health impacts seems odd and inappropriate when talking about health impacts to people living near the airport. The expected impacts to people include high risk of cardio-vascular diseases, asthma, cancer, shortened lifespan, etc., not to mention noise induced problems including sleep loss and cumulative impacts of both noise and emissions combined found to cause overlapping heart, brain, metabolic, cognitive, low-birth weight and pre-term birth effects. Most people would consider that a worsening of impacts of this type due to an ever increasing pollution load would move the dial.

Because NextGen procedures also increase hourly throughput, the added gates are necessary to accommodate added hourly movements. As the nation’s airports airspace and ground have become more congested, the two

improvements of concentrated paths, reduced distance between aircraft and added gates have now become the only tools left for the growth of the airline industry due to land limitations at constrained airports.

Without the project, airspace and ground congestion may preclude more hourly operations due to an incremental increased safety risk factor. FAA has failed to provide that risk assessment. Since the public is unable to compare the with/without project scenarios in terms of safety risk, nobody really knows whether the increased operations will occur or can occur without the improvements. This vague and irresponsible premise is what all expansion programs purpose and need are founded upon. Comparing future noise, emissions, and other impacts significance depends on this admission. If the same number of operations will come in the future whether you build it or not, why build it? There must be a purpose for spending billions of dollars besides a minor increase in efficiency. Added gates add throughput which adds polluters which increases pollution. And because jet aircraft are each a factory worth of emissions, each added aircraft is a major added source of public health risk.

This evaluation also does not give information about HAP health risks citing a lack of information. Many hazardous air pollutants have corresponding risk factors. The emissions of each HAP is known and can be modeled with risk factors to determine what the lifetime risk increase is for downwind communities. Within the area affected by HAP from LAX are communities eligible for environmental justice consideration. Because social equity initiatives around the country are very focused on alleviating disproportionate impacts to communities more vulnerable and less able to understand and/or protect themselves, it seems especially egregious this plan would ignore a type of analysis that can better prepare communities for climate and living resilience.

QUOTED SECTIONS BELOW:

4.1.1.5.2.3 Significance of Impact After Mitigation With implementation of Mitigation Measures MM-AQ/GHG (ATMP)-3 through 7 and MM-T (ATMP)-1, significant impacts associated with operational emissions would be reduced, but not to a level that would be less than significant.

Specifically, even with implementation of all feasible operations-related mitigation measures, the Project-related estimated incremental increases in daily operations-related emissions of NO<sub>x</sub>, SO<sub>x</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub> would

exceed the daily emission thresholds established by SCAQMD. No other feasible mitigation measures have been identified at this time that would further reduce impacts to air quality. Therefore, impacts to air quality from Project-related operational emissions would be significant and unavoidable

The emissions of CO, V\*C, and SO<sub>x</sub> would exceed the construction emission thresholds during the periods when one of the north runways is closed to safely tie-in the Taxiway D extension. The runway closure period would require aircraft to taxi farther to the open runways. Once these connections are completed, taxi times would drop and would be similar to Without Project taxi times. Although these runway closures would be temporary (approximately 4 to 5 months in two different years) relative to the total proposed Project construction duration, they do represent peak day total construction emissions for all pollutants. Construction emissions of NO<sub>x</sub> would exceed the construction emission thresholds in several years that do not include the runway closures. No other feasible mitigation measures have been identified that would further reduce these impacts to air quality. Therefore, impacts to air quality from Project-related construction emissions would be significant and unavoidable. 4.1.1-44

Based on the annual activity forecast and regression analysis results, passenger activity at LAX is forecasted to increase from 86.1 MAP in fiscal year (FY) 2018, the baseline year for most of the EIR's environmental analysis, to 110.8 MAP in FY 2028, the horizon year assumed for buildout of the proposed Project, (resulting in a compounded annual growth rate [CAGR] of 2.6. percent), while total annual aircraft operations are forecasted to increase from 715,000 annual operations in FY 2018 to 800,000 annual operations in FY 2028 (resulting in a CAGR of 1.1. percent).

#### 2.3.1.2.2 page 83

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For the final EIR, it would be helpful to include the following:

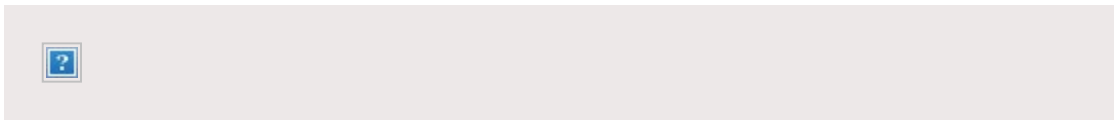
Conduct a health risk assessment from HAP

Use color coding to map areas of noise, emissions, poor health outcomes, low income/minority, multiple environmental impacts such as traffic and aviation impacts

Map the area of impact from UFP

Expand discussion to include mitigation of both noise and emissions on residents

**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 9:48:31 AM



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

Changes since 3/15/21 9:46 AM

1 row added

1 row added or updated (shown in yellow)

Row 79

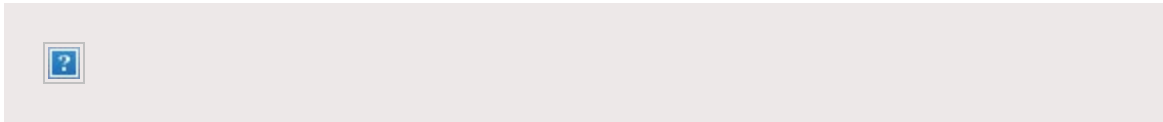
|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 79  |
| <b>Full Name</b>     | Kimberly L. Turner  |
| <b>Company Name</b>  |   |
| <b>Email Address</b> | turner.kimberly.4@gmail.com   |
| <b>Comments</b>      | Adding up to 27 new gates will increase negative noise and pollution impacts both near and away from the airport. There must be no expansion of airport facilities without reverting to pre-NextGen flight patterns that were dispersed, had a higher overall profile (less time at low altitudes). Expansion must consider these impacts in the EIR. NextGen concentrated flight patterns are dangerous to communities/ bring serious health dangers to the region. Human Health under flight paths MUST BE CONSIDERED for both arrivals and departures. The project should use findings from the recently released NES (Neighborhood Environmental Survey) and use ALREADY EXISTING metrics, specifically N-Above in combination with DNL, to reveal devastating impacts to communities miles from airports. No new gates without studying human health impacts in such a way that does not guarantee a FONSI. FAA's DNL metric and threshold of significance standards guarantee a finding of "no significant impact." It is an IMPOSSIBLE standard to meet away from the airport and the FAA knows that. No new gates. Communities must be considered. No new noise to new communities rarely previously impacted by noise pre-NextGen. |
| <b>Created</b>       | 03/15/21 9:46 AM  |
| <b>Project</b>       | ATMP-Draft EIR  |

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**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** FW: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 1:05:58 PM

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**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Monday, March 15, 2021 1:01 PM  
**To:** CRUZ, OHASSY C. <OCRUZ@lawa.org>  
**Subject:** Addition to Our LAX Comment Form: Notification



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Changes since 3/15/21 12:59 PM

1 row added

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1 row added or updated (shown in yellow)

Row 83

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 83  |
| <b>Full Name</b>     | LASHANTAE NEAL  |
| <b>Company Name</b>  | SEIU USWW member & worker at LAX  |
| <b>Email Address</b> | na  |
| <b>Comments</b>      | This project is a huge expansion and the airlines are going to make lots of money from it. If LAX is approving this then LAX needs to deal with the problems of LAX workers- affordable housing and good jobs. We have a problem with housing being too expensive in the communities where LAX workers like me live. My own uncle went from his own home to my grandmother's garage. So they could support each other. People are doubling up to survive or moving away. More and more people have to move away. My momma just had to move away from LA to afford housing. She was living in California city and commuting all the way to LA. More and more service workers from our neighborhoods are moving far away and commuting long distance to work. Airlines need to be responsible for using good responsible contractors that have good union jobs. When Jet Stream, a non-union company took over American cabin the jobs were not as good, and the employees wanted to the union but it took two years for that to happen. We |



need a better system to protect workers. We even have problems with our union work places. The race to the bottom with contracting out airline service jobs has created a very unsafe situation where employers cut corners at the expense of lax workers. Our workplace at LAX is very unsafe. The equipment we use to get to our work site. The high lift trucks don't go all the way up so you have to jump over to the plane. The trucks are not working they need to be functional and go all way the up. We don't even enough supplies to do our work like mops, dust pans, we are sent out to work with no tools. We look like fools because we don't have what we need to do our work. We work for the biggest airlines but the contracting companies are so cheap.

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**Project** ATMP-Draft EIR

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**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 8:01:30 AM



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Changes since 3/15/21 7:59 AM

1 row added

1 row added or updated (shown in yellow)

Row 78

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 78   |
| <b>Full Name</b>     | Suellen Wagner   |
| <b>Company Name</b>  |  |
| <b>Email Address</b> | suellenwagner@me.com   |
| <b>Comments</b>      | Adding up to 27 new gates will increase negative noise and pollution impacts both near and away from the airport. There must be no expansion of airport facilities without reverting to pre-NextGen flight patterns that were dispersed, had a higher overall profile (less time at low altitudes.) expansion must consider these impacts in the EIR. NextGen concentrated flight patterns are dangerous to communities, bring serious health dangers to the region. Human Health under flight paths MUST BE CONSIDERED for both arrivals and departures. The project should use findings from the recently released NES(Neighborhood Environmental Survey) and use existing metrics, specifically N-above in combination with DNL, to reveal devastating impacts far from airports. No new gates without studying human health impacts in such a way that does not guaranteed a FONSI. FAA's DNL metric and threshold of significance standards are reverse engineered to produce a finding of "no significant impact." No new gates. |
| <b>Created</b>       | 03/15/21 7:59 AM   |
| <b>Project</b>       | ATMP-Draft EIR   |

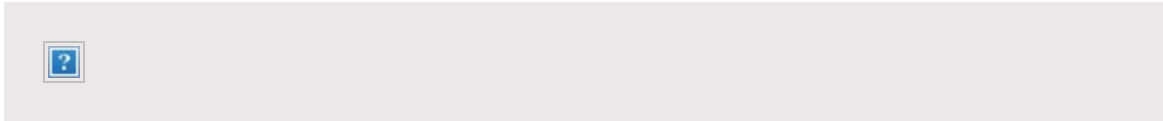
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**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** Fw: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 10:47:40 AM

**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Monday, March 15, 2021 10:42:47 AM  
**To:** CRUZ, OHASSY C.  
**Subject:** Addition to Our LAX Comment Form: Notification



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Changes since 3/15/21 10:40 AM

1 row added

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

Row 80

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 80   |
| <b>Full Name</b>     | Tony Specchierla   |
| <b>Company Name</b>  |  |
| <b>Email Address</b> | tapex@mac.com  |
| <b>Comments</b>      | No expansion until north arrival flight path is fixed over West Adams. Need to return to 6000 ft and dispersed arrival as current lawsuit with City of LA requested. |
| <b>Created</b>       | 03/15/21 10:40 AM  |
| <b>Project</b>       | ATMP-Draft EIR   |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

**From:** [Tristan.Robinson@ashurst.com](mailto:Tristan.Robinson@ashurst.com)  
**To:** [LAX-ATMP](#)  
**Subject:** Questions re the LAX ATMP  
**Date:** Tuesday, December 1, 2020 4:22:37 PM

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Good afternoon

My question is as follows:

1. What project delivery method will be used to procure and contract for the ATMP (or any portion(s) of it)? For example, are alternative project delivery methods (like a public-private partnership for a design-build-finance-operate-maintain contract, which has been used for the APM and ConRAC P3 projects under the Landside Access Modernization Program) being considered?

Thank you

Tristan

**Tristan Robinson**

Senior Associate, admitted only in California

[tristan.robinson@ashurst.com](mailto:tristan.robinson@ashurst.com)

**Ashurst**

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**From:** [Armando Munoz](#)  
**To:** [Jane Martin](#); [LAX-ATMP](#)  
**Subject:** QUESTION TO SUBMIT FOR LAX Airfield and Terminal Modernization  
**Date:** Tuesday, December 1, 2020 5:48:38 PM

---

Hello,

My name is Armando Muñoz and I'm a airport worker and a union member from SEIU-USWW.

My question is what plans does LAWA have to work with the city to convene a community benefits process to mitigate impact on workers and surrounding neighborhoods including housing, displacement, traffic, public transit, good jobs and the environmental health impacts of such a large expansion?

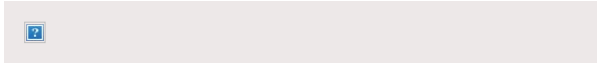
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**Armando Munoz**  
SEIU-United Service Workers West  
Executive Board Members Airports Division South  
323-479-8232 cell

**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** Fw: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 4:37:26 PM

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**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Monday, March 15, 2021 4:27:30 PM  
**To:** CRUZ, OHASSY C.  
**Subject:** Addition to Our LAX Comment Form: Notification



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Changes since 3/15/21 4:25 PM

1 row added  
1 attachment added

1 rows added or updated (shown in yellow)

|    |  | Row ID | Full Name              | Company Name                | Email Address        | Comments            | Created          | Project        |
|----|--|--------|------------------------|-----------------------------|----------------------|---------------------|------------------|----------------|
| 88 |  | 88     | Jordan R. Sisson, Esq. | Law Office of Gideon Kracov | jordan@gideonlaw.net | See file attachment | 03/15/21 4:27 PM | ATMP-Draft EIR |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

1 attachments added

[2021.03.15\\_ATMP DEIR Comment Letter\\_USWW and Unite Here.pdf \(2M\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 88: Jordan R. Sisson, Esq.

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Dear Ms. Quintanilla:

On behalf of Service Employees International Union, United Service Workers West and UNITE HERE Local 11, please see attached comment letter inclusive of three expert comments attached thereto. In addition to emailing this comment letter, we have submitted comments via LAWA's online portal (<https://app.smartsheet.com/b/form/b23e8d3a234b47f789334078f8c0bdd5>). If you have any issues retrieving said attachment, do not hesitate to call me directly at my cell phone provided below.

Please also confirm receipt of this message and the attached—many thanks.

-JRS

**Jordan R. Sisson**, Attorney  
Law Office of Gideon Kracov  
801 S. Grand Ave., 11th Floor  
Los Angeles, CA 90017  
Cell: 818-324-9752  
Office: 213-629-2071 ext. 1102  
Fax: 213-623-7755  
[jordan@gideonlaw.net](mailto:jordan@gideonlaw.net)  
[www.gideonlaw.net](http://www.gideonlaw.net)

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**GIDEON KRACOV**Attorney at Law801 South Grand Avenue  
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Fax: (213) 623-7755gk@gideonlaw.net  
www.gideonlaw.net

March 15, 2021

**VIA EMAIL & LAWA WEB-PORTAL:**Evelyn Quintanilla  
Los Angeles World Airports  
P.O. Box 92216  
Los Angeles, California 90009-2216  
[equintanilla@lawa.org](mailto:equintanilla@lawa.org)  
[lax-atmp@lawa.org](mailto:lax-atmp@lawa.org)  
<https://app.smartsheet.com/b/form/b23e8d3a234b47f789334078f8c0bdd5>**RE: DRAFT EIR COMMENTS; LAX AIRFIELD AND TERMINAL MODERNIZATION PROJECT**

Dear Ms. Quintanilla:

On behalf of Service Employees International Union, United Service Workers West (“**USWW**”) and UNITE HERE Local 11 (“**Local 11**”) (collectively “**Commenters**”), this Office provides the City of Los Angeles (“**City**”) Los Angeles World Airports (“**LAWA**”) the following comments<sup>1</sup> regarding the Draft Environmental Impact Report (SCH No. 2019049020) (“**DEIR**”)<sup>2</sup> for the above-referenced Airfield and Terminal Modernization Project (“**ATMP**” or “**Project**”) located at the Los Angeles International Airport (“**LAX**”).

In short, Commenters find that the DEIR fails to adequately analyze Project impacts and mitigation related to traffic, vehicle miles traveled (“**VMT**”), noise, air quality, and greenhouse gas (“**GHG**”) emissions, and also lacks an adequate project description and any overriding consideration findings. As such, Commenters urge the City/LAWA to stay action on any Project approvals until the issues identified below have been addressed in a recirculated DEIR pursuant to the California Environmental Quality Act, Pub. Res. Code § 21000 *et seq.*, (“**CEQA**”) and 14 Cal. Code Regs. § 15000, *et seq.* (“**CEQA Guidelines**”).

This Project can and must do better. Rising inequality threatens Los Angeles’ prosperity. There are serious challenges in the region concerning affordable housing and living wage jobs — and COVID has made things even more difficult for our members. USWW and Local 11 work to stem this rising tide of inequality and fight to make our region a place of opportunity for all—a place where their members can work and afford to live. LAWA must better consider to what extent this Project will ensure better permanent service jobs for airline service/hospitality workers near LAX who will feel the significant air quality, GHG, and other impacts caused by the Project. True community and worker benefits—as identified below—are needed if this Project is to be approved.

<sup>1</sup> Please note that pages cited herein are either to the page’s stated pagination (referenced herein as “**p. ##**”) or the page’s location in the referenced PDF document (referenced herein as “**PDF p. ##**”).

<sup>2</sup> Inclusive of all appendices referenced herein as (“**APP-##**”).





This comment letter incorporates by this reference in their entirety the following comment letters: 1) expert traffic comments by RK Engineering Group; 2) expert noise comments by RK Engineering Group; and 3) expert air quality/GHG comments by SWAPE (attached hereto as Exhibits A, B, and C [respectively]).

## I. STANDING OF COMMENTERS

USWW represents more than 40 thousand property service workers across California, including approximately 3,700 employees at LAX (pre-COVID) with an additional 1,300 security/janitorial workers living within approximately six miles of LAX. USWW and its sister local unions have many members, including public sector and healthcare workers, who reside and work in Los Angeles where this Project is located.

Local 11 represents more than 25,000 workers employed in hotels, restaurants, airports, sports arenas, and convention centers throughout Southern California and Phoenix, Arizona—including more than 5,600 workers at LAX and 900 in the Airport Hospitality Enhancement Zone (“AHEZ”) (pre-COVID).

Members of USWW and Local 11 join together to fight for improved living standards and working conditions. Making these comments to public officials in connection with matters of public concern compliance with applicable zoning rules and compliance with the CEQA is protected by the First Amendment, the *Noerr-Pennington* doctrine, and is within the core functions of the union. Unions have standing to litigate land use and environmental claims. (See *Bakersfield Citizens v. Bakersfield* (2004) 124 Cal.App.4th 1184, 1198.) So too, they have public interest standing given that the Project relates to LAWA’s public duty to comply with applicable zoning and CEQA laws, and where USWW and Local 11 seek to have that duty enforced. (See e.g., *Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 914-916, n6; *La Mirada Avenue Neighborhood Assn. of Hollywood v. City of Los Angeles* (2018) 22 Cal.App.5th 1149, 1158-1159; *Weiss v. City of Los Angeles* (2016) 2 Cal.App.5th 194, 205-206; *Save the Plastic Bag Coalition v. City of Manhattan Beach* (2011) 52 Cal.4th 155, 166, 169–170.)

## II. THE DEIR FAILS TO SATISFY CEQA’S EIR REQUIREMENTS

### A. BRIEF BACKGROUND ON CEQA

CEQA requires lead agencies to analyze the potential environmental impacts of its actions in an environmental impact report. (See, e.g., Pub. Res. Code § 21100; *Cmtys. for a Better Env’t v. S. Coast Air Quality Mgmt. Dist.* (2010) 48 Cal.4th 310.) The EIR is the very heart of CEQA. (*Dunn-Edwards v. BAAQMD* (1992) 9 Cal.App.4th 644, 652.) “The ‘foremost principle’ in interpreting CEQA is that the Legislature intended the act to be read so as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language.” (*Cmtys. for a Better Env’t v. Cal. Res. Agency* (2002) 103 Cal.App.4th 98, 109.)

**CEQA’S PURPOSE:** CEQA has two primary purposes. First, CEQA is designed to inform decision makers and the public about the potential, significant environmental effects of a project. (See CEQA Guidelines § 15002(a)(1).) To this end, public agencies must ensure that its analysis “stay in step with evolving scientific knowledge and state regulatory schemes.” (*Cleveland National Forest Foundation v. San Diego Assn. of Governments (“Cleveland II”)* (2017) 3 Cal.5th 497, 504.) Hence, an analysis which “understates the severity of a project’s impacts impedes meaningful public discussion and skews the decisionmaker’s perspective concerning the environmental

consequences of the project, the necessity for mitigation measures, and the appropriateness of project approval.” (*Id.*, on remand (“*Cleveland III*”) (2017) 17 Cal.App.5th 413, 444; see also *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 564 [quoting *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 392].)

Second, CEQA requires public agencies to avoid or reduce environmental damage by requiring implementation of “environmentally superior” alternatives and all feasible mitigation measures. (CEQA Guidelines § 15002(a)(2) & (3); see also *Citizens of Goleta Valley*, 52 Cal.3d at 564.) If a project has a significant effect on the environment, the agency may approve the project only if it finds that it has “eliminated or substantially lessened all significant effects on the environment where feasible” and that any significant unavoidable effects on the environment are “acceptable due to overriding concerns.” (Pub. Res. Code § 21081; see also CEQA Guidelines § 15092(b)(2)(A) & (B).)

**STANDARD OF REVIEW FOR EIRS:** Although courts review an EIR using an ‘abuse of discretion’ standard, that standard does not permit a court to “uncritically rely on every study or analysis presented by a project proponent in support of its position ... [,] [a] clearly inadequate or unsupported study is entitled to no judicial deference.” (*Berkeley Keep Jets Over the Bay v. Bd. of Port Comm’rs.* (2001) 91 Cal.App.4th 1344, 1355 [quoting *Laurel Heights*, 47 Cal.3d at 409 n. 12].) A prejudicial abuse of discretion occurs “if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.” (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722; see also *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 946.)

**SUBSTANTIAL EVIDENCE:** Under CEQA, substantial evidence includes facts, a reasonable assumption predicated upon fact, or expert opinion supported by fact; not argument, speculation, unsubstantiated opinion or narrative, clearly inaccurate or erroneous evidence, or evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment. (See e.g., Pub. Res. Code §§ 21080(e), 21082.2(c), and CEQA Guidelines §§ 15064(f)(5) & 15384.) As such, courts will not blindly trust bare conclusions, bald assertions, and conclusory comments without the “disclosure of the ‘analytic route the . . . agency traveled from evidence to action.’” (*Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 404 405 [quoting *Topanga Assn. for a Scenic Community v. County of Los Angeles* (1974) 11 Cal.3d 506, 515]; see also *Citizens of Goleta Valley* (1990) 52 Cal.3d at 568-569.)

## **B. THE DEIR ANALYSIS OF TRAFFIC IMPACTS IS GROSSLY INADEQUATE AND MUST BE REDONE**

CEQA requires analysis of traffic impacts related to a project. (See *Kings County Farm Bureau v. Hanford* (1990) 221 Cal.App.3d 692, 727.) In particular, CEQA requires analysis of project-related traffic impacts in a manner that does not minimize cumulative impacts. (See e.g., *Cleveland III*, 17 Cal.App.5th at 444-445 [traffic analysis based on methodology with known data gaps that underestimated traffic impacts necessarily prejudiced informed public participation and decisionmaking]; *Kings County Farm Bureau*, 221 Cal.App.3d at 718, 727 [rejecting determination that less than one percent to area emissions was less than significant because analysis improperly focused on the project-specific impacts and did not properly consider the collective effect of the relevant projects on air quality]; *Save Cuyama Valley v. County of Santa Barbara* (2013) 213 Cal.App.4th 1059, 1072 [upheld the use of same thresholds for immediate and cumulative impacts when its application was “undoubtedly more stringent cumulative-impact threshold”]; *Al Larson*

*Boat Shop, Inc. v. Board of Harbor Comm'rs*, (1993) 18 Cal.App.4th 729, 749 [upheld where cumulative impacts were not minimized or ignored.] The relevant inquiry is not only the relative amount of increased traffic that the Project will cause, but whether any additional amount of Project traffic should be considered significant in light of the already serious problem. (See *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019, 1025.)

A prejudicial abuse of discretion occurs under CEQA “if the failure to include relevant information precludes informed decisionmaking and informed public participation, thereby thwarting the statutory goals of the EIR process.” (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 722; see also *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1117; *County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 946.) The EIR must disclose information that is needed for a reasoned analysis of the issues. (See *Madera Oversight Coalition v. County of Madera* (2011) 199 Cal.App.4th 48, 104.)

While the courts review an EIR using an “abuse of discretion” standard, “the reviewing court is not to ‘uncritically rely on every study or analysis presented by a project proponent in support of its position.’ A ‘clearly inadequate or unsupported study is entitled to no judicial deference.” (*Berkeley Keep Jets Over the Bay v. Bd. of Port Comm'rs.* (2001) 91 Cal.App.4th 1344, 1355 [emphasis added] [quoting *Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal. 3d 376, 391 409, fn. 12].) Substantial evidence in the record must support any foundational assumptions used for the impact analyses in the EIR. (See e.g., *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal. 3d 553, 568 [EIR must contain facts and analysis, not just bare conclusions]; *Laurel Heights*, 47 Cal. 3d at 392-93 [agency’s conclusions must be supported with substantial evidence].)

As pointed out in expert traffic comments (attached hereto as *Exhibit A*) the DEIR’s traffic analysis contains several flaws that fail to analyze the full extent of the Project’s long-term impacts, as well as fails to impose all reasonable feasible mitigation measures. While the expert traffic comment letter speaks for itself, Commenters wish to highlight some of the findings about the DEIR’s inadequate traffic analysis, including:

- The DEIR fails to perform a Level of Service (“LOS”) analysis even though local traffic guidelines in effect at the time compelled as much.
- The DEIR fails to analyze long-term vehicle miles traveled (“VMT”) impacts beyond 2028, even though such impacts are admitted.
- The DEIR’s VMT analysis fails to account for all VMTs, specifically non-passenger trips (e.g., employees and other trips) for this regional serving use. This is inconsistent with local VMT traffic assessment guidelines, which underestimates the full impact of the project.
- While the DEIR admits significant unavoidable passenger VMT impacts, no mitigation measures are offered to help relieve this increase in VMT as a result of the project. The DEIR incorrectly proclaims that there is no feasible mitigation to reduce this impact when, in fact, there are numerous additional measures available (e.g., additional off-site van pools and neighborhood shuttles for passengers, expand public transit services, provide public transit subsidies, provide bike-share and car-share programs, improve pedestrian and bicycle infrastructure, etc.).

- The DEIR fails to specify any transportation impacts during the seven-year construction phase of the project.
- The DEIR's consistency analysis with the City's Mobility Plan 2035 is entirely lacking, whereby it looks to merely three measures of the plan, when the Plan includes more than 50 different policies that should be analyzed.

In sum, as highlighted by the traffic expert comment letter, the DEIR's traffic/VMT analysis and conclusions rely upon faulty assumptions, data gaps, and missing relevant information—which ultimately ignores and minimizes the ATMP's traffic/VMT impacts—and thus violates CEQA. (See e.g., *Cleveland III*, 17 Cal.App.5th at 444-445; *Al Larson Boat Shop, Inc.*, 18 Cal.App.4th at 749; *San Joaquin Raptor/Wildlife Rescue Center*, 27 Cal.App.4th at 722; *Citizens of Goleta Valley*, 52 Cal. 3d at 568.)

### **C. THE DEIR VASTLY UNDERSTATES NOISE IMPACTS AND CUTS OFF IMPACT ANALYSIS IN 2028**

An EIR must disclose and feasibly mitigate noise impacts. (See *Los Angeles Unified School District v. City of Los Angeles* (1997) 58 Cal.App.4th 1019.) These impacts must be explained with “plain language” and draw an explicit connection between increased exposures to their likely human-health effects (e.g., headaches, nuisance, etc.). (See CEQA Guidelines § 15140; see also *San Franciscans for Reasonable Growth v. City and County of San Francisco* (1987) 193 Cal.App.3d 1544, 1548; *Bakersfield Citizens*, 124 Cal.App.4th at 1219.) Furthermore, a lead agency may not ignore cumulative noise impacts by claiming an area is already heavily impacted by noise and, therefore, project-related additions would be insignificant. (See *Los Angeles Unified*, 58 Cal.App.4th at 1025.)

Here, as pointed out in the expert noise comment letter (attached hereto as *Exhibit B*), the DEIR's noise analysis contains several flaws that mask all potential impacts from the ATMP, which need to be mitigated to the maximum extent feasible. While this expert comment letter speaks for itself, Commenters highlighted the following findings made by the noise experts:

- The DEIR's noise analysis delivers contradictory statements and appears to dismiss the widely recognized fact that environmental noise affects human health. The California Noise Control Act explicitly declares that excessive noise is a serious hazard to the public health and exposure to certain levels of noise can result in physiological and psychological damage.
- The DEIR relies on unsubstantiated 29 decibel (“**dba**”) attenuation for classrooms, which is nine more than the widely accepted 20 dba attenuation standard.
- The DEIR fails to provide any data that the 28 schools identified within the applicable 65-dba Community Noise Equivalent Level (“**CNEL**”) contour around LAX would achieve this even the excessive 29 dba noise attenuation.
- The DEIR fails to provide maximum exterior noise levels (“**Lmax**”) at exposed schools. This is critical in establishing the environmental setting of the school.
- The DEIR fails to consider long-term noise impacts beyond 2028, even though LAX is planned to generate an additional 165,316 annual aircraft operations by 2045—a level that exceeds Burbank Airport operations from last year.

- The DEIR's CNEL contour maps make no changes to the new terminal location, which is unlikely given that the Project is proposing new terminals in place of parking lots. This will impact nearby sensitive receptors (e.g., hotel patrons).
- The DEIR fails to provide supporting documentation underlying its noise modeling that makes verification impossible and, thus, the conclusions are unsubstantiated
- The DEIR fails to use actual field measurements to determine construction noise impacts. This is particularly important when determining nighttime noise impacts.
- The DEIR does not include all reasonable feasible mitigation measures, such as a requirement for active construction noise monitoring at adjacent noise sensitive receptors anytime construction activities take place during nighttime hours. Active nighttime noise monitoring would help ensure actual construction noise levels (not based on computer models) do not exceed the nighttime noise standards in the City of Los Angeles or exceed existing ambient nighttime noise levels by more 5 dBA.

In sum, as highlighted by the expert noise comment letter, the DEIR's noise analysis relies on missing relevant data, false assumptions, fails to draw explicit connections to real noise impacts—which ultimately minimizes noise impacts suggesting the area is already impacted—and thus violates CEQA. (See e.g., *Cleveland III*, 17 Cal.App.5th at 444-445; *San Joaquin Raptor/Wildlife Rescue Center*, 27 Cal.App.4th at 722; *San Franciscans for Reasonable Growth*, 193 Cal.App.3d at 1548; *Los Angeles Unified*, 58 Cal.App.4th at 1025.)

**D. AIR QUALITY & GHG IMPACTS ARE UNDERESTIMATED IN THE DEIR WHICH FAILS TO SHOW ITS WORK**

Air quality impacts and their concomitant impacts on human health must be studied in the CEQA document. (See *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal.App.4th 1184, 1220 [quoting CEQA Guidelines § 15126.2(a)].) Courts have recognized the threat of toxic air contaminants (“TACs”), such as the carcinogenic threat posed by diesel particulate matter (“DPM”) emitted from highway vehicles and particularly from heavy-duty trucks. (See *Cleveland III*, 17 Cal.App.5th at 438-439 [citing a growing body of scientific evidence, including several studies and estimates by California Air Resources Board, showing proximity to heavy traffic volumes is associated with increased respiratory symptoms, risk of heart and lung disease, elevated mortality rates, and that DPM resulted in 720 excess cancer cases per million in the San Diego region in 2000].) Hence, CEQA requires an agency to correlate transportation-related emissions to anticipated adverse health impacts. (*Id.* at 33; see also *Berkeley Keep Jets Over the Bay Com. v. Board of Port Comrs.* (2001) 91 Cal.App.4th 1344, 1367-1371.)

So too, the California Supreme Court demands robust GHG analysis to assess a project's impact on climate change. Lead agencies must provide the contours of their logical argument and fill the analytical gap to support their significance determinations with substantial evidence and reasoned explanation. (See *Center for Biological Diversity v. Cal. Dept. of Fish and Wildlife* (“*Newhall Ranch*”) (2015) 62 Cal.4th 204, 227.) Under CEQA Guidelines § 15064.4(b), acceptable methods include comparing the increased GHG emissions to (a) the pre-project baseline emissions, or (b) an adopted numeric threshold, or (c) determine the project's compliance with an officially adopted plan intended to reduce a project's cumulative contribution to the effects of climate change (e.g., climate action plans, GHG reduction plans). (*Id.* at 229-231.) While agencies enjoy discretion in the choice of methodology, CEQA requires the analysis be “based to the extent possible on scientific and factual data ... stay[ing] in step with evolving scientific knowledge and state regulatory schemes.”

(*Cleveland II*, 3 Cal.5th at 515, 519 [quoting CEQA Guidelines § 15064(b)].)

Moreover, merely because “a project is designed to meet high building efficiency and conservation standards ... does not establish that its [GHG] emissions from transportation activities lack significant impacts.” (*Newhall Ranch*, 62 Cal.4th at 229 [citing Natural Resources Agency].)<sup>3</sup> This concept is known as ‘additionality’ whereby GHG emission reductions otherwise required by law or regulation are appropriately considered part of the baseline and, pursuant to CEQA Guideline § 15064.4(b)(1), a new project’s emission should be compared against that existing baseline.<sup>4</sup> Hence, a “project should not subsidize or take credit for emissions reductions which would have occurred regardless of the project.”<sup>5</sup> In short, as observed by the Court, newer developments must be more GHG-efficient. (See *Newhall Ranch*, 62 Cal.4th at 226.)

As pointed out in the air quality/GHG comment letter (attached hereto as *Exhibit C*), the DEIR fails to adequately evaluate the Project’s air quality, health risk, and GHG impacts. Findings on DEIR insufficiency include:

- The DEIR utilizes incomplete/unsubstantiated input parameters for its air quality and GHG modeling (e.g., underestimates land uses, failure to analyze construction trips, underestimates off-road construction equipment emissions, and underestimates architectural coating emissions, etc.). As a result, neither the air quality, health risks, or GHG conclusions can be relied upon.
- While admitting significant and unavoidable air quality/GHG emissions, the DEIR fails to consider and implement numerous feasible mitigation measures—as required under CEQA.
- The DEIR’s Health Risk Assessment (“HRA”) relies on incomplete/unsubstantiated modeling and, thus, DEIR’s air model underestimates emissions associated with the Project’s construction and operational activities. As a result, toxic air contaminants (“TAC”) are underestimated.
- The DEIR’s HRA fails to disclose total emissions from operational sources and, thus, cannot be verified to ensure the HRA fully accounts for all sources.
- The DEIR fails to analyze the ATMP’s air quality and GHG impacts beyond 2028 and, thus, the DEIR fails to consider the long-term operational impacts of the Project.

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<sup>3</sup> See Final Statement of Reasons for Regulatory Action: Amendments to State CEQA Guidelines Addressing Analysis and Mitigation of GHG Emissions Pursuant to SB-97 (“**Final Statement of Reasons**”) (Dec. 2009), p. 23 (while a Platinum LEED® rating may be relevant to emissions from a building’s energy use, “that performance standard may not reveal sufficient information to evaluate transportation-related emissions associated with that proposed project”), [http://resources.ca.gov/ceqa/docs/Final\\_Statement\\_of\\_Reasons.pdf](http://resources.ca.gov/ceqa/docs/Final_Statement_of_Reasons.pdf).

<sup>4</sup> See Final Statement of Reasons, p. 89; *see also* California Air Pollution Control Officers Association (“CAPCOA”) (Aug. 2010) Quantifying Greenhouse Gas Mitigation Measures, pp. 32, A3 (“in practice is that if there is a rule that requires, for example, increased energy efficiency in a new building, the project proponent cannot count that increased efficiency as a mitigation or credit unless the project goes beyond what the rule requires; and in that case, only the efficiency that is in excess of what is required can be counted.”), <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.

<sup>5</sup> *Ibid.*, CAPCOA, at p. A-3.

- The DEIR’s GHG analysis fails to consider performance-based standards under the California Air Resources Board’s (“CARB”) 2017 Scoping Plan to ensure Project consistency with relevant GHG plans. For example, the DEIR estimates the Project would achieve 20.40 VMT per employee, which exceeds that anticipated under CARB’s 2017 Scoping Plan.
- The DEIR’s GHG analysis fails to consider performance-based standards under the Southern California Association of Governments’ (“SCAG”) 2020 Regional Transportation Plan/Sustainable Communities Strategies (“RTP/SCS”). For example, the DEIR estimates 20.40 VMT per employee exceeds the 19.2 VMT anticipated in target year 2045 under SCAG’s 2020 RTP/SCS.

In sum, as highlighted by the expert comment letter, the DEIR’s air quality and GHG analysis relies on faulty assumptions, missing scientific data, and analytical gaps showing the Project is meeting its additionality requirement—which ultimately minimizes emission impacts—and thus violates CEQA. (See e.g., *Citizens of Goleta Valley*, 52 Cal. 3d at 568; *Newhall Ranch*, 62 Cal.4th at 226-229; *Cleveland II*, 3 Cal.5th at 515, 519.)

#### **E. THE DEIR HAS AN IMPROPER AND INACCURATE PROJECT DESCRIPTION**

An “accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR.” (*San Joaquin Raptor Rescue Ctr. v. Cnty. of Merced* (2007) 149 Cal.App.4th 645, 654-655 [quoting *Cnty. of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 199] [emphasis in original].) As one court explained, “only through an accurate view of the project may affected outsiders and public decision-makers balance the proposal’s benefit against its environmental cost, consider mitigation measures, assess the advantage of terminating the proposal (i.e., the ‘no project’ alternative), and weigh other alternatives in the balance.” (*Citizens for a Sustainable Treasure Island v. City & Cnty. of San Francisco* (2014) 227 Cal.App.4th 1036, 1052.) Hence, an accurate project description is an “indispensable component of a valid EIR.” (*Western Placer Citizens for an Agr. and Rural Env’t v. Cnty. of Placer* (2006) 144 Cal.App.4th 890, 898.)

Here, a reoccurring criticism in the attached comment letters is the DEIR’s narrow, self-serving timeline of assessing the Project’s impacts. First, the DEIR anticipates that the current airport configuration is a “constraint on growth” starting in 2028. (DEIR, p. 2-17.) But the ATMP’s improvements (e.g., extending Terminal 1 and constructing a new passenger terminal with additional gates) (DEIR, p. 2-1, 2-9, Fig. 2-1) are characterized as merely “modernization” of LAX to accommodate continued growth in airline passengers over “several decades” (DEIR, p. 2-18). This is internally inconsistent with the claim that the Project is not growth-inducing. The DEIR fails to: 1) explain how the anticipated growth at LAX was not already accounted for by the SCAG’s 2020 RTP/SCS, which noted several modernization projects already approved and ongoing at LAX;<sup>6</sup> or 2) describe how the ATMP will not prematurely expand LAX’s capacity that will lead to the airport maintaining or even significantly increasing its regional share of air travel—contrary to what SCAG anticipates (DEIR, Tbl. 2-1 [LAX’s regional passenger share anticipated to drop from regional 76.75 % to 64.42 % from 2017 to 2045]). In both scenarios, impacts will be more significant than those forecast in the 2020 RTP/SCS.

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<sup>6</sup> SCAG (2020) RTP/SCS, Aviation and Airport Ground Access Technical Report, p. 38 (noting several LAX projects), [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial\\_aviation-and-airport-ground-access.pdf?1606001540](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial_aviation-and-airport-ground-access.pdf?1606001540).

Second, and more fundamentally, the DEIR's impact analysis arbitrarily limits its analysis to 2028 when project construction is to end. This ignores the impacts associated with nearly 45 million annual passengers ("MAP") anticipated post-2028. (DEIR, APP-B [110.8 MAP in 2028 to 155.6 MAP in year 2045].) Essentially, the DEIR ignores the entire operational and longer-term impacts of the Project (i.e., post-2028). (See e.g., DEIR, p. 4.1.1-34 & 36 [air impacts associated only for 2028 modeled].) For example, there is no explanation of how air emissions from this post-2028 growth will comport with the emissions anticipated for the air basin in a manner consistent with the Clean Air Act ("CAA") and applicable State Implementation Plan ("SIP"). This is a blatant abuse of discretion lacking in substantial evidence. A 'clearly inadequate or unsupported study is entitled to no judicial deference.'" (*Berkeley Keep Jets*, 91 Cal.App.4th at 1355.)

In sum, the DEIR's project description and truncated analysis is inaccurate and misleading, which distorts the public decisionmaking process—which violates CEQA. (See *Citizens for a Sustainable Treasure Island*, 227 Cal.App.4th at 1052.) To say post-2028 growth is limited without the Project (on the one hand), and then fail to analyze the impacts of post-2028 growth as an impact of the ATMP (on the other) is a major error. Furthermore, this truncated concept of the Project serves only to chop-up the full impacts of the ATMP, which also violates CEQA. (See e.g., *San Joaquin Raptor/Wildlife Rescue Center v. Cnty. of Stanislaus* (1994) 27 Cal.App.4th 713, 730 [held use of "truncated project concept" violated CEQA]; *Bozung v. LAFCO* (1975) 13 Cal.3d 263, 283-284 [CEQA mandates "that environmental considerations do not become submerged by chopping a large project into many little ones—each with a minimal potential impact on the environment - which cumulatively may have disastrous consequences."].) A project's CEQA review must assess "the whole of an action" to ensure that all of the project's environmental impacts are considered. (CEQA Guidelines § 15378.) Before undertaking a project, the lead agency must assess the environmental impacts of all reasonably foreseeable phases of a project, and a public agency may not segment a large project into two or more smaller projects to mask serious environmental consequences or evade CEQA review. (See e.g., CEQA Guidelines § 15378(a); *McQueen v. Bd. of Supervisors* (1988) 202 Cal.App.3d 1136, 1146-47.)

#### **F. THE DEIR FAILS TO ADOPT ALL FEASIBLE MITIGATION**

CEQA disfavors formulation of mitigation measures to post-approval studies with no performance standards to guide the mitigation. (See e.g., CEQA Guidelines § 15126.4(a)(1)(B); *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 92-93.) A lead agency may only defer the formulation of mitigation measures when it possesses "'meaningful information' reasonably justifying an expectation of compliance." (*Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 308 [quoting *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 77 fn. 5]; see also *Sacramento Old City Association v. City Council of Sacramento* (1991) 229 Cal.App.3d 1011, 1028-29 [mitigation measures may be deferred only "for kinds of impacts for which mitigation is known to be feasible"].)

CEQA requires lead agencies to "craft mitigation measures that would satisfy enforceable performance criteria." (*City of Maywood v. Los Angeles Unified School Dist.* (2012) 208 Cal.App.4th 362, 407.) The imposition of specific, performance-based mitigation measures helps "[e]nsure the integrity of the process of decisionmaking by precluding stubborn problems or serious criticism from being swept under the rug." (*Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935; see also *Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 280-281.) Nor may a lead agency rely on mere compliance with existing laws or unrealistic mitigation measures of uncertain efficacy/feasibility. (See e.g., *Cleveland III*, 17 Cal.App.5th at 433 ["none of these measures had any probability of implementation, their inclusion



in the EIR was illusory.”]; *Californians for Alternatives to Toxics v. Department of Food and Agriculture* (2005) 136 Cal.App.4th 1, 17 [“[c]ompliance with the law is not enough to support a finding of no significant impact under the CEQA.”]; *Kings County Farm Bureau*, 221 Cal.App.3d at 727 [finding groundwater purchase agreement inadequate mitigation because there was no evidence that replacement water was available].)

Here, another reoccurring criticism in the attached comment letters is the DEIR’s failure to implement all feasible mitigation measures for admitted significant impacts. Here, the DEIR admits the ATMP will have significant, unmitigated air quality, GHG, noise, and transportation impacts. (DEIR, pp. 1-24 – 1-25.) However, the Project fails to impose all feasible mitigation measures—as confirmed by expert comments attached hereto, including numerous measures that the DEIR fails to show to be infeasible. These measures, as set forth in the expert comment letters, include:

**TRAFFIC** (Exhibit A, p. 4 [highlighted for your convenience]):

mitigation to reduce this impact. However, there are in fact numerous additional mitigation measures that can be included to reduce the VMT impact, including: provide additional off-site van pools and neighborhood shuttles for passengers, expand public transit services, provide public transit subsidies, provide bike-share and car-share programs, and encourage passengers (such as through advertisement) to use other modes of transportation getting to and from the airport. Additionally, there are other improvements that the project could do to improve pedestrian and bicycle infrastructure which has been shown to reduce VMT. Thus, additional mitigation measures should also include improvements to the pedestrian network, on-site traffic calming improvements, protected bike lanes, cycle tracks or separated bike trails, additional secured bike storage and end of trip facilities, and other non-automotive improvements to help reduce the projects affect upon VMT.

**NOISE** (Exhibit B, p. 5 [highlighted for your convenience]):

Section 4.7.3.5.2.2, Mitigation Measures. The DEIR does not include all reasonably feasible mitigation measures for reducing potential noise impacts. The Construction Noise Control Plan should include a requirement for active construction noise monitoring at adjacent noise sensitive receptors anytime construction activities take place during nighttime hours. Active nighttime noise monitoring would help ensure actual construction noise levels (not based on computer models) do not exceed the nighttime noise standards in the City of Los Angeles or exceed existing ambient nighttime noise levels by more 5 dBA. The monitoring program should monitor and establish the adequate baseline noise levels for each receptor prior to commencing any activity. The monitoring program should also notify construction management personnel when noise levels approach and/or exceed the applicable thresholds. Construction activity should cease or be modified in order to ensure violations do not occur. Repeated violations should result in fines or other penalties.

**AIR QUALITY & GHGS (Exhibit C, pp. 12-18 [highlighted for your convenience]):**

- **Ground Support Equipment Conversion:**
  - Transition all baggage tugs, belt loaders, lifts, pushback tractors, and utility carts at SDIA that are owned and operated by airlines and their ground handling contractors to service aircraft, shall be transitioned to alternative fuels (i.e., electric, natural gas, renewable diesel, biodiesel).

\* \* \*

- **Renewable Electricity:**
  - Power project-related buildings with 100 percent renewable electricity.
- **Clean Vehicle Parking:**
  - Designate 10 percent of new parking stalls for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicle.
- **Electric Vehicle Chargers:**
  - Install electric vehicle charging ports at three percent of new parking stalls and another three percent would be "EVSE-ready."
- **Ground Transportation Clean Vehicle Program:**
  - Implement a Commercial Ground Transportation Clean Vehicle Program.
- **Bicycle Facilities:**
  - Install shower stalls and lockers, as well as covered bicycle storage for employees.
- **Employee Parking Cash-Out Program:**
  - Implement a parking cash-out program for employees.

\* \* \*

- Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions).
- Instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.
- Before starting onsite ground disturbance, demolition, or construction activities, submit a Construction Emissions Minimization Plan for review and approval. The plan shall include estimates of the construction timeline, with a description of each piece of off-road equipment required. The description may include, but is not limited to, equipment type, equipment manufacturer, engine model year, engine certification (Tier rating), horsepower, and expected fuel usage and hours of operation. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used. Make the Construction Emissions Minimization Plan available to the public for review onsite during working hours. Post at the construction site a legible and visible sign summarizing the plan. State that the public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. Post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

- Develop and implement a phased carbon management program that is consistent with the standards of ACI “Level 3+” Airport Carbon Accreditation Program, or equivalent, including calculation of annual carbon emissions from airport activity, identifying emissions reduction targets, tracking progress toward achieving effective carbon management procedures, and publishing an annual biennial carbon footprint report as a component of the Airport’s broader environmental sustainability program.

\* \* \*

| CAPCOA's Quantifying Greenhouse Gas Mitigation Measures  |  |
|--|--|
| <b>Measures – Energy</b>   |  |
| <i>Building Energy Use</i>   |  |
| Obtain Third-party HVAC Commissioning and Verification of Energy Savings   |  |
| <i>Lighting</i>  |  |
| Install Higher Efficacy Public Street and Area Lighting  |  |
| Limit Outdoor Lighting Requirements  |  |
| <i>Alternative Energy Generation</i>   |  |
| Establish Onsite Renewable or Carbon-Neutral Energy Systems  |  |
| Establish Onsite Renewable Energy System – Solar Power   |  |
| Utilize a Combined Heat and Power System   |  |
| <b>Measures – Transportation</b>   |  |
| <i>Land Use/Location</i>   |  |
| Increase Destination Accessibility   |  |
| Increase Transit Accessibility   |  |
| Orient Project Toward Non-Auto Corridor  |  |
| Locate Project near Bike Path/Bike Lane  |  |
| <i>Neighborhood/Site Enhancements</i>  |  |
| Provide Pedestrian Network Improvements, such as:  |  |
| <ul style="list-style-type: none"> <li>• Compact, mixed-use communities</li> <li>• Interconnected street network</li> <li>• Narrower roadways and shorter block lengths</li> <li>• Sidewalks</li> <li>• Accessibility to transit and transit shelters</li> <li>• Traffic calming measures and street trees</li> <li>• Parks and public spaces</li> <li>• Minimize pedestrian barriers</li> </ul>                       |  |
| Provide Traffic Calming Measures, such as:   |  |
| <ul style="list-style-type: none"> <li>• Marked crosswalks</li> <li>• Count-down signal timers</li> <li>• Curb extensions</li> <li>• Speed tables</li> <li>• Raised crosswalks</li> <li>• Raised intersections</li> <li>• Median islands</li> <li>• Tight corner radii</li> <li>• Roundabouts or mini-circles</li> <li>• On-street parking</li> <li>• Planter strips with trees</li> <li>• Chicanes/chokers</li> </ul> |  |
| Incorporate Bike Lane Street Design (on-site)  |  |
| Provide Bike Parking in Non-Residential Projects   |  |
| Provide Electric Vehicle Parking   |  |

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| <p><b>Commuter Trip Reduction Programs</b></p> <p><b>Implement Commuter Trip Reduction (CTR) Program – Voluntary</b></p> <ul style="list-style-type: none"> <li>• Carpooling encouragement</li> <li>• Ride-matching assistance</li> <li>• Preferential carpool parking</li> <li>• Flexible work schedules for carpools</li> <li>• Half time transportation coordinator</li> <li>• Vanpool assistance</li> <li>• Bicycle end-trip facilities (parking, showers and lockers)</li> <li>• New employee orientation of trip reduction and alternative mode options</li> <li>• Event promotions and publications</li> <li>• Flexible work schedule for employees</li> <li>• Transit subsidies</li> <li>• Parking cash-out or priced parking</li> <li>• Shuttles</li> <li>• Emergency ride home</li> </ul>  |
| <p><b>Implement Commuter Trip Reduction (CTR) Program – Required Implementation/Monitoring</b></p> <ul style="list-style-type: none"> <li>• Established performance standards (e.g. trip reduction requirements)</li> <li>• Required implementation</li> <li>• Regular monitoring and reporting</li> </ul>   |
| <p><b>Implement Subsidized or Discounted Transit Program</b></p>   |
| <p><b>Provide Ent of Trip Facilities, including:</b></p> <ul style="list-style-type: none"> <li>• Showers</li> <li>• Secure bicycle lockers</li> <li>• Changing spaces</li> </ul>  |
| <p><b>Implement Commuter Trip Reduction Marketing, such as:</b></p> <ul style="list-style-type: none"> <li>• New employee orientation of trip reduction and alternative mode options</li> <li>• Event promotions</li> </ul>  |
| <ul style="list-style-type: none"> <li>• Publications</li> </ul>   |
| <p><b>Implement Preferential Parking Permit Program</b></p>  |
| <p><b>Price Workplace Parking, such as:</b></p> <ul style="list-style-type: none"> <li>• Explicitly charging for parking for its employees;</li> <li>• Implementing above market rate pricing;</li> <li>• Validating parking only for invited guests;</li> <li>• Not providing employee parking and transportation allowances; and</li> <li>• Educating employees about available alternatives.</li> </ul>   |
| <p><b>Implement Employee Parking “Cash-Out”</b></p>  |
| <p><b>Transit System Improvements</b></p>  |
| <p><b>Transit System Improvements, including:</b></p> <ul style="list-style-type: none"> <li>• Grade-separated right-of-way, including bus only lanes (for buses, emergency vehicles, and sometimes taxis), and other Transit Priority measures. Some systems use guideways which automatically steer the bus on portions of the route.</li> <li>• Frequent, high-capacity service</li> <li>• High-quality vehicles that are easy to board, quiet, clean, and comfortable to ride.</li> <li>• Pre-paid fare collection to minimize boarding delays.</li> <li>• Integrated fare systems, allowing free or discounted transfers between routes and modes.</li> <li>• Convenient user information and marketing programs.</li> <li>• High quality bus stations with Transit Oriented Development in nearby areas.</li> <li>• Modal integration, with BRT service coordinated with walking and cycling facilities, taxi services, intercity bus, rail transit, and other transportation services.</li> </ul> |

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| Implement Transit Access Improvements, such as: <ul style="list-style-type: none"> <li>• Sidewalk/crosswalk safety enhancements</li> <li>• Bus shelter improvements</li> </ul>  |
| Expand Transit Network  |
| Increase Transit Service Frequency/Speed  |
| Provide Bike Parking Near Transit   |
| Provide Local Shuttles  |
| <b>Road Pricing/Management</b>  |
| Implement Area or Cordon Pricing  |
| Improve Traffic Flow, such as: <ul style="list-style-type: none"> <li>• Signalization improvements to reduce delay;</li> <li>• Incident management to increase response time to breakdowns and collisions;</li> <li>• Intelligent Transportation Systems (ITS) to provide real-time information regarding road conditions and directions; and</li> <li>• Speed management to reduce high free-flow speeds.</li> </ul>   |
| Required Project Contributions to Transportation Infrastructure Improvement Projects  |
| <b>Vehicles</b>   |
| Utilize Alternative Fueled Vehicles, such as: <ul style="list-style-type: none"> <li>• Biodiesel (B20)</li> <li>• Liquefied Natural Gas (LNG)</li> <li>• Compressed Natural Gas (CNG)</li> </ul>  |
| <b>Measures – Water</b>   |
| <b>Water Supply</b>   |
| Use Gray Water  |
| Use Locally Sourced Water Supply  |
| <b>Water Use</b>  |
| Adopt a Water Conservation strategy   |
| Design Water-Efficient Landscapes (see California Department of Water Resources Model Water Efficient Landscape Ordinance), such as: <ul style="list-style-type: none"> <li>• Planting vegetation with minimal water needs, such as native species;</li> <li>• Choosing vegetation appropriate for the climate of the project site;</li> <li>• Choosing complimentary plants with similar water needs or which can provide each other with shade and/or water.</li> </ul> |
| Plant Native Trees and Vegetation   |
| <b>Measures – Vegetation</b>  |
| <b>Vegetation</b>   |
| Urban Tree Planting   |
| Create New Vegetated Open Space   |

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| <b>Measures – Construction</b>  |
| <i>Construction</i>   |
| Use Alternative Fuels for Construction Equipment  |
| Urban Tree Planting   |
| Use Electric and Hybrid Construction Equipment  |
| Limit Construction Equipment Idling Beyond Regulation Requirements  |
| Institute a Heavy-Duty Off-Road Vehicle Plan, including: <ul style="list-style-type: none"> <li>• Construction vehicle inventory tracking system;</li> <li>• Requiring hour meters on equipment;</li> <li>• Document the serial number, horsepower, manufacture age, fuel, etc. of all onsite equipment; and</li> <li>• Daily logging of the operating hours of the equipment.</li> </ul>   |
| Implement a Construction Vehicle Inventory Tracking System  |
| <b>Measures – Miscellaneous</b>   |
| <i>Miscellaneous</i>  |
| Establish a Carbon Sequestration Project, such as: <ul style="list-style-type: none"> <li>• Geologic sequestration or carbon capture and storage techniques, in which CO<sub>2</sub> from point sources is captured and injected underground;</li> <li>• Terrestrial sequestration in which ecosystems are established or preserved to serve as CO<sub>2</sub> sinks;</li> <li>• Novel techniques involving advanced chemical or biological pathways; or</li> <li>• Technologies yet to be discovered.</li> </ul>   |
| Establish Off-Site Mitigation   |
| Use Local and Sustainable Building Materials  |
| Require Environmentally Responsible Purchasing, such as: <ul style="list-style-type: none"> <li>• Purchasing products with sustainable packaging;</li> <li>• Purchasing post-consumer recycled copier paper, paper towels, and stationary;</li> <li>• Purchasing and stocking communal kitchens with reusable dishes and utensils;</li> <li>• Choosing sustainable cleaning supplies;</li> <li>• Leasing equipment from manufacturers who will recycle the components at their end of life;</li> <li>• Choosing ENERGY STAR appliances and Water Sense-certified water fixtures;</li> <li>• Choosing electronic appliances with built in sleep-mode timers;</li> <li>• Purchasing 'green power' (e.g. electricity generated from renewable or hydropower) from the utility; and</li> <li>• Choosing locally-made and distributed products.</li> </ul> |

**G. THE DEIR FAILS TO IDENTIFY OVERRIDING CONSIDERATIONS**

The DEIR should identify facts relating to a CEQA-compliant statement of overriding considerations. (See *Lawler v. City of Redding* (1992) 7 Cal.App.4th 778 [vacating city's approval of a sports facility on city-owned land in an unincorporated area until adopting measures to sufficiently mitigate noise impacts].) When approving a project that will have significant environmental impacts not fully mitigated, a lead agency must adopt a "statement of overriding considerations" finding that the project's benefits outweigh its environmental harm. (Pub. Res. Code § 21081(b); see also CEQA Guidelines § 15043; *Sierra Club v. Contra Costa County* (1992) 10 Cal.App.4th 1212, 1222.) An overriding statement expresses the larger, more general reasons for approving the project, such as the need to create new jobs, provide housing, generate taxes, and the like. (See

*Concerned Citizens of S. Central LA v. Los Angeles Unif. Sch. Dist.* (1994) 24 Cal.App.4th 826, 847.) It must fully inform and disclose the specific benefits expected to outweigh environmental impacts, supported by substantial evidence. (See CEQA Guidelines §§ 15043(b) & 15093(b); see also *Sierra Club*, 10 Cal.App.4th at 1223.) However, an agency may adopt a statement of overriding considerations only after it has imposed all feasible mitigation measures to reduce a project's impact to less than significant levels. (See CEQA Guidelines §§ 15091 & 15126.4.) Hence, decisionmakers may not approve a project when feasible mitigation measures can substantially lessen or avoid such impacts. (See e.g., Pub. Res. Code § 21002; CEQA Guidelines § 15092(b)(2).) So too, additional overriding considerations may be necessary to adequately override those additional impacts that the DEIR underestimates.

To the extent that overriding considerations are needed, key among the findings that the lead agency must make is that:

“Specific economic, legal, social, technological, or other considerations, including the provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or alternatives identified in the environmental impact report ... [and that those] benefits of the project outweigh the significant effects on the environment.” (Pub. Res. Code § 21081(a)(3) & (b), emphasis added.)

Here, the DEIR fails to identify significant impacts and/or incorporate feasible mitigation measures. Nor does the DEIR identify any overriding considerations. To the extent the City considers approving the Project with significant environmental impacts, the City should consider the overriding benefits to service/hospitality workers near LAX and the Airport Hospitality Enhancement Zone (“AHEZ”) that will suffer the brunt of significant air quality, GHG, and other impacts caused by the ATMP development. Considerations should include, at a minimum: a) the number of construction and operational jobs that will be for “highly trained workers” and what the likely salary and wage ranges of these jobs will be; and b) to what extent this Project will ensure better permanent service jobs for contracted airline service/hospitality workers.

Furthermore, the City/LAWA should consider the following that ultimately serves to reduce the Project's significant VMT, GHG, and mobile-emissions impacts:

- Expanded public transit service from neighborhoods where service/hospitality workers live to LAX/AHEZ at times needed for all shifts of work;
- Free or reduced transit passes for LAX/AHEZ workers;
- Free or reduced parking at LAX/AHEZ for workers who carpool;
- Quality job creation that expands housing opportunities near LAX/AHEZ for employees via:
  - a. Operational jobs that provide real living wages able to afford an apartment in Los Angeles, which housing experts estimate must be \$33/hour in 2015<sup>7</sup>—LAX's current

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<sup>7</sup> Southern California Public Radio (89.3KPPC) (1/15/15) LA Residents Need To Make \$33 An Hour To Afford The Average Apartment (“You need to earn at least \$33 an hour — \$68,640 a year — to be able to afford the average apartment in Los Angeles County, according to Matt Schwartz, president and chief executive of the

living wage of \$16.50/hour is not enough even when healthcare costs are not considered. This is necessary for workers to be able to afford to live near LAX/AHEZ and not commute longer distance that increase VMT and mobile-emissions;

and/or

- b. Airlines contribute to an affordable housing fund directly for service workers living in neighborhoods surrounding the airport that will promote employees living closer to LAX/AHEZ;

and/or

- c. Operational jobs that provide real healthcare, which must be increased from the current LAX living wage law requiring merely \$5.55/hour for healthcare.<sup>8</sup>

#### **H. DEIR RECIRCULATION IS REQUIRED**

CEQA requires a lead agency to recirculate an EIR when significant new information is added to the EIR following public review but before certification. (See Pub. Res. Code § 21092.1.) New information is significant if “the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project” including, for example, “a disclosure showing that ... [a] new significant environmental impact would result from the project.” (CEQA Guidelines § 15088.5.) Here, recirculation is required because the DEIR fails to analyze the Project’s real impacts (i.e., post-2028) and fails to implement all feasible mitigation measures and/or demonstrate proposed mitigation measures are infeasible (to name a few of the fatal flaws of this DEIR). Neither the public nor decisionmakers can meaningfully comment and consider the Project’s impacts absent this information and, thus, a recirculated DEIR that addresses the issues discussed herein is necessary.

### **III. CONCLUSION**

In closing, Commenters urge the City/LAWA to stay all action on the Project until the issues discussed herein are resolved in a recirculated, CEQA-compliant DEIR. Faults in the DEIR include incomplete analysis and mitigation of traffic, air quality, noise, GHG impacts, an inadequate project description, and the absence of overriding considerations.

This Project can and must do better. Rising inequality threatens Los Angeles’ prosperity. There are serious challenges in the region concerning affordable housing and living wage jobs — and COVID has made things even more difficult for our members. USWW and Local 11 work to stem this rising tide of inequality and fight to make our region a place of opportunity for all—a place where their members can work and afford to live. LAWA must better consider to what extent this Project will ensure better permanent service jobs for airline service workers who will feel the significant air quality, GHG, and other impacts caused by the Project. True community and worker benefits are needed if this Project is to be approved.

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California Housing Partnership, which advocates for affordable housing.”), <https://www.scpr.org/blogs/economy/2015/01/15/17806/la-residents-need-to-make-34-an-hour-to-afford-ave/>.

<sup>8</sup> California USSW service employee’s health and welfare trust fund has been quoted healthcare costs for a family Kaiser plan for LAX employees that cost up to \$9.40/hour for family coverage.

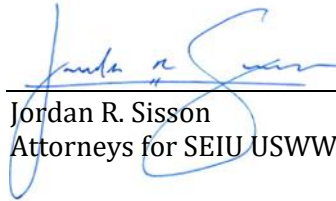


On behalf of Commenters, this Office requests, to the extent not already on the notice list, all notices of CEQA actions and any approvals, determinations, or public hearings to be held on the Project under state or local law requiring local agencies to mail such notices to any person who has filed a written request for them. (Pub. Res. Code §§ 21092.2, 21167(f) and Gov. Code § 65092 and LAMC § 197.01.F.) Please send notice by electronic and regular mail to: Jordan R. Sisson, Esq., 801 S. Grand Avenue, 11th Fl., Los Angeles, CA 90017, [jordan@gideonlaw.net](mailto:jordan@gideonlaw.net).

Thank you for your consideration of these comments. Commenters reserve the right to supplement these comments at future hearings and proceedings for this Project. (See *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1120 [CEQA litigation not limited only to claims made during EIR comment period].) We ask that this letter and attachments are placed in the administrative record for the Project.

Sincerely,

LAW OFFICE OF GIDEON KRACOV



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Jordan R. Sisson  
Attorneys for SEIU USWW and UNITE HERE Local 11

Attachments:

- Exhibit A: RK Engineering Group (3/15/21) LAX ATMP DEIR Transportation Review
- Exhibit B: RK Engineering Group (3/15/21) LAX ATMP DEIR Noise Review
- Exhibit C: SWAPE (3/15/21) Comments on the ATMP

**EXHIBIT A**



March 15, 2021

Mr. Jordan Sisson  
LAW OFFICE OF GIDEON KRACOV  
801 South Grand Avenue, 11<sup>th</sup> Floor  
Los Angeles, CA 90017

**Subject: LAX Airfield and Terminal Modernization Project Draft EIR  
Transportation Review, City of Los Angeles**

Dear Mr. Sisson:

**Introduction**

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this review of the LAX Airfield and Terminal Modernization Project Draft Environmental Impact Report (DEIR), dated October 2020, with respect to transportation impacts. The project consists of airfield, terminal and landside improvements to the Los Angeles International Airport (LAX).

Los Angeles World Airport (LAWA) proposes to implement airfield, terminal and landside roadway improvements at LAX. The proposed project consists of several primary elements, (including airfield improvements) that would enhance operational management and safety within the airfield, new terminal facilities to upgrade passenger processing capabilities and enhance the passenger experience, and an improved system of the roadways to better access the Central Terminal Area (CTA) and new facilities while reducing congestion. It is anticipated that the project construction would occur from Year 2021 to Year 2028 (when full completion of the project is expected).

The project is an extensive multi-phase construction project which will occur over several years (2021 to 2028) and has the potential of impacting the public roadway and transportation system both during construction and with future operation of the expanded facilities.

RK has reviewed the DEIR and its appendices with respect to the proposed project and the impact to transportation systems in the vicinity of the site. The Transportation Impact Analysis primarily focused on the project's Vehicle Miles Traveled (VMT) impacts, consistency with the local and regional transportation/land use plans, geometric design hazards and freeway safety analysis in the area. A traditional Level of Service (LOS) analysis of the roadway systems in the study area was not provided as part of the DEIR or its appendices.

RK has identified several deficiencies with respect to the assessment of the impacts to the public roadway system. These deficiencies include failing to analyze the full extent of the project's long term impact and a lack of meaningful analysis of the project's impact on the adequacy of existing transportation infrastructure within the study area to accommodate the increased throughput capacity and efficiency of the LAX facilities. The DEIR also does not consider all reasonably feasible mitigation measures for reducing potential impacts. Furthermore, the construction impacts of the project, which are expected to last until Year 2028 are glossed over, and the vehicular impacts during construction with respect to roadway, intersection and parking have not been analyzed in the DEIR.

### **Comments**

The following comments are offered with respect to the transportation impacts of the LAX Airfield and Terminal Modernization Project DEIR:

1. The DEIR did not assess the Level of Service (LOS) impacts to the roadways and intersections in the project study area. The Notice of Preparation (NOP) for the DEIR was dated April 2019, and at that time, the Los Angeles Department of Transportation (LADOT) Traffic Study Guidelines dated January 2016 were in effect. Even though the DEIR is dated October 2020, the guidelines in affect at the time of the NOP should have been utilized. Those guidelines require a detailed LOS analysis of those intersections where the project would have a potential impact upon the existing and future levels of service. While RK acknowledges that transportation impacts under CEQA should now generally be based on VMT, leaving out the LOS analysis presents incomplete information as to the actual impact of this project on the local and area-wide roadway system. The expected impacts of the increased employment and passenger activity at LAX between now and Year 2028 when the project is completed must be associated with the project.

2. The DEIR does not disclose the full extent of the project's transportation impact by failing to analyze long-term conditions (i.e. year 2045). The transportation analysis is based on project impacts in year 2028, yet as discussed in Section 2.3.1.2.2, and supported by the data in Appendix B, "airfield congestion is not projected to be a constraint on growth until after year 2028". Hence, one of the primary purposes of the project is to reduce potential constraints on growth after year 2028. This is evident when looking at the Activity Forecast Report, provided in Appendix B, Table 3-5, which shows that the total unconstrained annual passengers at LAX will grow from 110.8 Million Annual Passengers in year 2028 to 155.6 Million Annual Passengers in year 2045. The result is that the project would cause a substantially greater increase in VMT and traffic generation, compared to "without" project conditions, after year 2028. Yet the DEIR conceals the long term impacts of the project by only analyzing near-term conditions in year 2028. The final EIR should address all reasonably foreseeable long term impacts (i.e. year 2045) from the project, as is reported elsewhere in the DEIR.
3. The total trip generation without the proposed project will be 399,752 daily trips, as shown in Table 4.8-4, whereas with the total trip generation with the project is only projected to be 407,942 daily trips, as shown in Table 4.8-8. This is only an increase of 8,190 daily trips, which calculates to be only a 2% increase in daily trips. Since the existing number of daily trips is noted as 316,128 daily trips, this indicates that the growth in daily trips with the project from Existing Conditions to the With Project Conditions (Year 2028) is 91,814 daily trips, however, the project is only responsible for 8,190 of those trips which is less than 10% of the total projected growth. As discussed in comment #2 above, the project trip generation would likely be substantially higher in year 2045 than year 2028. Failing to disclose the full extent of project trip generation and project VMT results in underreported impacts.
4. The DEIR does not analyze and disclose the full impact of the project's net effect on VMT. Threshold 4.8-3 incorrectly evaluates the VMT from "passengers" only. Instead, Threshold 4.8-3 should be based on the total project service population VMT, including passengers, employees and other trips. For regional serving uses, the City of Los Angeles Transportation Assessment Guidelines require that regional serving projects should be evaluated to determine whether the project would result in a net increase in "total" VMT. By not evaluating VMT impacts from the entire service population of the project, including employees, the project impacts are underreported.

5. The transportation mitigation measures in the DEIR are inadequate and do not include all reasonably feasible requirements for reducing VMT. According to Page 4.8-56 of the DEIR, the project has a significant and unavoidable impact as a result of total passenger VMT in comparison to the baseline conditions. It would require a reduction of 32,786 VMT per day to meet the passenger related VMT criteria. However, no mitigation measures are offered to help relieve this increase in VMT as a result of the project. CEQA requires significant impacts be mitigated to the maximum extent feasible. THE DEIR incorrectly proclaims that there is no feasible mitigation to reduce this impact. However, there are in fact numerous additional mitigation measures that can be included to reduce the VMT impact, including: provide additional off-site van pools and neighborhood shuttles for passengers, expand public transit services, provide public transit subsidies, provide bike-share and car-share programs, and encourage passengers (such as through advertisement) to use other modes of transportation getting to and from the airport. Additionally, there are other improvements that the project could do to improve pedestrian and bicycle infrastructure which has been shown to reduce VMT. Thus, additional mitigation measures should also include improvements to the pedestrian network, on-site traffic calming improvements, protected bike lanes, cycle tracks or separated bike trails, additional secured bike storage and end of trip facilities, and other non-automotive improvements to help reduce the projects affect upon VMT.
6. The DEIR offers very little in terms of transportation impacts during construction, which is expected to occur for at least seven years. Typically, most major projects such as the proposed project would make estimates for each phase of construction of the traffic impacts associated with the hundreds of construction workers and numerous trips made by construction vehicles that need to travel to and from the project site. None of this type of evaluation was included in the DEIR and future plans are left open to figure out how the transportation system will be accommodated during construction. With the combination of continued passenger growth at the airport, the disruption of traffic conditions as a result of the construction work and the addition of hundreds of additional vehicles, including large trucks, there will be substantial impacts to traffic flow and delays to the motoring public both using the airport and traveling on the near-by roadways.

The impacts of parking, the large number of construction workers, and equipment/materials storage have not been addressed in the DEIR. It raises questions, such as: How and where will construction workers park and to what extent will this affect parking for the public at the airport? If shuttle buses will be employed by the project to transport construction workers from off-site parking facilities, then to what extent will this affect airport operations? The potential impacts during construction have not been adequately evaluated and the DEIR continually differs mitigation of these issue into the future.

7. The DEIR leaves out several key policy objectives when assessing whether the project would conflict with an applicable program, plan, ordinance, or policy addressing the circulation system (including transit, roadways, bicycle and pedestrian facilities) that was adopted to protect the environment. For example, Table 4.8-11 only analyzes the project's consistency with three (3) policies from of the Los Angeles Mobility Plan 2035. However, there are in fact over fifty (50) different policies in the Mobility Plan 2035, many of which the project would likely conflict with. For example, the DEIR has not demonstrated how the project is consistent with Mobility Plan 2035 policies to enhance roadway safety (Policy 1.1), promote complete streets (Policy 1.2), ensure multi-modal detour facilities are provided during construction (Policy 1.6), expand bicycle network (Policy 2.6), maintain the vehicle network (Policy 2.7), accommodate people with disabilities (Policy 3.2), increase transit service (Policy 3.4), implement first and last mile solutions to transit service (Policy 3.5), support integrated and dynamic transportation database (Policy 4.2), encourage zero emissions vehicle (Policy 5.4). The DEIR should assess consistency with all applicable policy measures.

## **Conclusions**

RK Engineering Group, Inc. has reviewed the LAX Airfield and Terminal Modernization Project DEIR with respect to transportation impacts. Several shortcomings within the analysis have been identified, and as a result, not all potentially significant impacts have been identified.

In particular, the DEIR fails to analyze the full extent of the project impact, which will occur after year 2028, when the modernization project would allow for significantly more growth in passenger travel. The DEIR also does not disclose the potential roadway safety and operational impacts from construction, passenger vehicle and employee traffic.

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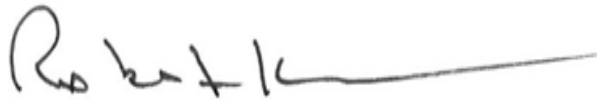
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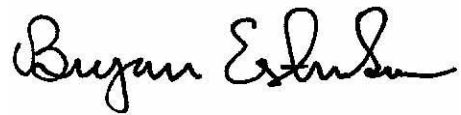
Furthermore, the DEIR does not apply all reasonably feasible mitigation measures to mitigate significant VMT impacts to the maximum extent feasible.

RK appreciates the opportunity to work with the LAW OFFICE OF GIDEON KRACOV in reviewing the LAX Airfield and Terminal Modernization Project DEIR. If you have any questions please give call at (949) 474-0809

Sincerely,



Robert Kahn, P.E.  
Founding Principal



Bryan Estrada, AICP, PTP  
Principal

Registered Civil Engineer 20285  
Registered Traffic Engineer 0555



rk16416.doc  
JN:2952-2020-01





## Robert Kahn, P.E., T.E

Founding Principal

### Areas of Expertise

Traffic Engineering  
 Transportation Planning  
 Transportation Solutions  
 Traffic Impact Analysis  
 Circulation Systems for Planned Communities  
 Traffic Control Device Warrants  
 Traffic Calming  
 Traffic Safety Studies  
 Bicycle Planning  
 Parking Demand Studies  
 Transportation Demand Management  
 Traffic Signal, Signing and Striping Plans  
 Traffic Control Plans  
 Parking Lot Design  
 Acoustical Engineering  
 Noise Impact Studies  
 Expert Witness / Legal Services

### Professional History

RK Engineering Group, Inc., Founding Principal  
 2001-Present

RKJK & Associates, Inc., Principal, 1990-2000

Robert Kahn and Associates, Inc., Principal, 1988-1990

Jack G. Raub Company,  
 Vice President Engineering Planning, 1977-1988

The Irvine Company, Program Engineer, 1972-1977

Caltrans CA Division of Highways, Assistant Engineer, 1968-1972

### Representative Experience

Robert Kahn, P.E., has worked professionally in traffic engineering and transportation planning since 1968. He received his Master of Science degree in civil engineering from the University of California, Berkeley, Institute of Transportation and Traffic Engineering. Mr. Kahn received his Bachelors degree in Civil Engineering from the University of California, Berkeley.

Mr. Kahn started his career in California Division of Highways (Caltrans) and developed the first computerized surveillance and control system for the Los Angeles area. Mr. Kahn developed the California Incident Detection Logic which is utilized throughout California for the detection of traffic incidents on the freeway system.

Mr. Kahn has worked for a major land development company preparing Master Plans for infrastructure. He also has worked eleven years with a multi-disciplined consulting engineering firm in charge of the Engineering Planning Department. This included all facets of preliminary design, tentative map preparation, transportation and environmental engineering, and public agency coordination.

Mr. Kahn has provided traffic and transportation services to major planned communities including Aliso Viejo, Coto De Caza, Foothill Ranch, Highlands Ranch in Denver, Colorado, Mission Viejo, Talega Planned Community in San Clemente, and Wolf Valley Ranch in Temecula. He has also provided contract traffic engineering services to the Cities of Irvine, Norwalk, Perris and San Jacinto in Riverside County, California.

Mr. Kahn has prepared traffic impact studies for numerous communities throughout Southern California, Nevada and in Colorado. Major traffic impact studies include the Aliso Viejo Town Center, the Summit Development, the Shops at Mission Viejo, Kaleidoscope, Dana Point Headlands, Foothill Ranch, Talega, Majestic Spectrum, and Centre Pointe in the City of Chino.

His work in the area of parking demand studies and parking lot design has been extensive. Shared parking studies for the Aliso Viejo Town Center, Foothill Ranch Towne Centre, Trabuco Plaza and numerous commercial sites have been completed to accurately determine the peak parking demand for mixed use projects. Mr. Kahn has been able to make the most efficient utilization of parking lots by maximizing efficient and safe systems.

## Robert Kahn, P.E., T.E

## Founding Principal

### Education

University of California, Berkeley, M.S., Civil Engineering, 1968

University of California, Berkeley, B.S., Civil Engineering, 1967

University of California, Los Angeles, Graduate Courses in Transportation Systems, 1970

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### Registrations

California Registered Civil Engineer  
No. 20285 – April 1971

California Registered Professional Engineer  
Traffic, No. 0555 – June 1977

Colorado Professional Engineer  
No. 22934, November 1984

Nevada Professional Engineer Civil  
No. 10722 – March 1994

County of Orange, California Certified Acoustical Consultant  
No. 201020 - 1984

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### Affiliations

Institute of Transportation Engineers (ITE)

American Society of Civil Engineers (ASCE)

Urban Land Institute (ULI)

Orange County Traffic Engineers Council (OCTEC)

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### Teaching

UCI Graduate Urban Design Studio Class – Guest Instructor

ITS Berkeley – Tech Transfer  
Fundamentals of Traffic Engineering – Instructor

UCI Senior Civil Engineering Mentoring Program (CE181)

Mr. Kahn has been an innovator in developing and implementing traffic calming techniques. Over twenty years ago, Mr. Kahn refined the design and implementation standards for speed humps for use in local neighborhoods. Most recently, he has been involved in the development of modern roundabouts in lieu of traffic signals or other traffic control devices at intersections. Mr. Kahn previously presented the use of traffic calming devices in newly developing communities to the Institute of Transportation Engineers Traffic Calming Conference in Monterey, California.

Mr. Kahn has been involved in the design of traffic signal systems, signing and striping plans on hundreds of projects for both the public and private sector. Most recently, he has completed the design of several traffic signals which will serve the renovated Shops at Mission Viejo Mall. Mr. Kahn was in charge of a major ITS project for the City of Irvine, which provided fiberoptic interconnect and closed circuit TV along Barranca Parkway, Alton Parkway and Lake Forest Drive.

Mr. Kahn has been involved in acoustical engineering since 1978. He was in responsible charge of the Aliso Viejo Noise Monitoring Program which redefined the 65 CNEL noise contours for MCAS El Toro. He has also developed computer applications of the FHWA Noise Model.

Mr. Kahn has prepared numerous noise impact reports in the Aliso Viejo, Mission Viejo, Foothill Ranch, Santa Margarita, Ladera and Talega Planned Communities. Noise impacts from stationery sources including car washes, loading docks, air conditioning compressors, drive-thru speakers and other sources have been evaluated in the Aliso Viejo Auto Retail Center Noise Study, Albertsons Store 606 Noise Study-Rancho Cucamonga, Pro Source Distribution Building Final Noise Study in Ontario. Major specific plan and zone change noise studies have been prepared for the Summit Heights Specific Plan in Fontana, Lytle Creek Land and Resources Property in Rialto, Tamarack Square in Carlsbad, California, International Trade and Transportation Center in Kern County, California, and Sun City/Palm Springs.

Mr. Kahn founded the firm of Robert Kahn and Associates in 1988, which was the predecessor to RKJK & Associates, Inc. in 1990. He has made presentations to the ITE and the California Public Works Conference. Mr. Kahn has published numerous articles on traffic impact assessment, traffic calming, striping and the status of Bicycle Sharing in the USA. He was awarded the Wayne T property award in 2011-2012. Mr. Kahn has been a mentor and advisor to the UCI Senior Civil Engineering Project (CE181) for the past several years. He provides students the opportunity to develop a real life transportation project for the program.

## Robert Kahn, P.E., T.E.

## Founding Principal

Robert Kahn has been involved in numerous legal cases as an expert witness and providing legal assistance in the area of traffic and environmental engineering. This has included traffic/parking impact analysis, traffic/circulation/parking impacts of ROW takes, traffic engineering design review, traffic safety studies and noise/vibration impact assessments. A sampling of these projects include the following cases:

- Tustin Avenue/Rose Drive Grade Separation Impact to Del Cerro Mobile Estates, City of Placentia
- 9582 Chapman Avenue – ULI Shared Parking, City of Garden Grove
- Plantation Apartments Norwalk 12809 Kalnor Avenue I-5 Construction Noise Monitoring Assessment
- City of Huntington Beach vs. Alvarez, et al, Traffic Review of ROW taking
- Gene Autry Way Extension – Impacts to Anaheim Holiday Inn and Staybridge Suites Hotel, Anaheim
- UCSD Student Center Traffic and Parking Impact Review, City of San Diego
- Palma De La Reina Traffic Impact Analysis Review
- Newport Tech Center Traffic Study Review, Newport Beach
- City of Irvine Planning Area 18, 34 and 39 DEIR Traffic Impact Review, City of Irvine
- City of San Diego Big Box Ordinance, City of San Diego
- City of Yucaipa Big Box Ordinance, City of Yucaipa
- Electra Real Estates USA Mid Coast Corridor Transit Project Traffic/Circulation and Parking Impact Review, City of San Diego
- Rancho El Revino Specific Plan Traffic Impact Study Review
- President Hotel Santa Ana parking lot dispute
- Caceres vs. City of Fontana, represented City in an Intersection (Production at Santa Ana Ave.) Accident
- Corona vs. City of Fontana, represented City in an Intersection (Sierra Ave. and Summit Ave.) Accident
- Sunset and Gordon Mixed Use Site Traffic Review
- Baldwin Hills Crenshaw Plaza EIR and Traffic Study Review
- Saint Mary's University Wellness Pavilion EIR and Traffic Study Review
- 15 Degree South Residential Project Traffic Review
- Review of the OCTA Tustin Avenue Rose Drive Grade Separation Representing the Del Cerro Mobile Estates
- OCTA State College Blvd Grade Separation Representing the Fullerton Commerce Center and Fullerton Industrial Park

# Bryan Estrada, AICP, PTP

Principal

## Areas of Expertise

Transportation and Environmental Planning  
Transportation Demand Management  
Traffic Impact Studies  
Parking Studies  
Air Quality Analysis  
Greenhouse Gas/Global Climate Change Analysis  
Environmental Acoustics/Noise Analysis  
CEQA Compliance  
Synchro Traffic Analysis Software  
California Emissions Estimator Model (CalEEMod)  
FHWA Noise Modeling  
SoundPLAN Software  
AutoCAD

## Education and Training

University of California, Irvine, B.A., Urban Studies  
California Air Resources Board, Air Quality Training Program  
Geo Instruments Vibration Monitoring Short Course

## Professional History

RK Engineering Group, Inc.  
Principal  
2007 - Present

## Certificates and Affiliations

American Institute of Certified Planners (AICP)  
Professional Transportation Planner (PTP)  
American Planning Association  
Association of Environmental Professionals

## Representative Experience

Mr. Bryan Estrada is a native of Southern California and also stayed in the area by attending the University of California, Irvine, School of Planning, Policy and Design where he received a Bachelor of Arts degree in Urban Studies. Mr. Estrada's multidisciplinary background is concentrated around current transportation challenges and their environmental impacts within urban areas. Mr. Estrada is committed to sustainable development practices, transportation demand management, and global climate change awareness.

Since 2007, Mr. Estrada has gained experience in the many aspects of Transportation and Environmental Planning while working with RK Engineering Group. He is an active member of the American Planning Association (APA) and the Association of Environmental Professionals (AEP), and stays up to date on the latest trends and topics concerning CEQA policy. He is frequently engaged with local government agencies, community groups, and developers to help to craft innovative solutions to mitigate traffic, noise and air quality impacts throughout the community.

Mr. Estrada's experience includes traffic/transportation planning, air quality and greenhouse gas analysis, and environmental acoustics/noise analysis. He has also contributed to the design and construction of traffic signal plans, signing and striping plans and traffic control plans. He is regularly out in the field performing assessments and inventories of project sites and meeting with community stakeholders.

Mr. Estrada works on transportation and environmental planning projects that range from focused site-specific technical studies to regional and General Plan level analyses. His recent work includes Mixed Use Development projects in Downtown Huntington Beach, the City of Aliso Viejo General Plan Update and Aliso Viejo Town Center Vision Plan, Eleanor Roosevelt High School eStem Academy Traffic Impact Study and On-Site Circulation Plan (Eastvale, CA), Great Wolf Lodge Resort (Garden Grove, CA), Starbucks Coffee Shops (multiple locations through Southern California), Paradise Knolls Specific Plan (Jurupa Valley, CA), Vista Del Agua Specific Plan (Coachella, CA), and Monterey Park Hotel Mixed Use Development Project (Monterey Park, CA).

Mr. Estrada has obtained the American Institute of Certified Planners (AICP) certification granted by the American Planning Association and the Professional Transportation Planner (PTP) certification granted by the Transportation Professional Certification Board.

**EXHIBIT B**

March 15, 2021

Mr. Jordan Sisson  
LAW OFFICE OF GIDEON KRACOV  
801 South Grand Avenue, 11<sup>th</sup> Floor  
Los Angeles, CA 90017

**Subject: LAX Airfield and Terminal Modernization Project Draft EIR Noise  
Review, City of Los Angeles**

Dear Mr. Sisson:

**Introduction**

RK ENGINEERING GROUP, INC. (RK) is pleased to provide this review of potential environmental noise impacts from the LAX Airfield and Terminal Modernization Project. This review is based on the information provided in the Los Angeles International Airport Airfield and Terminal Modernization Project Draft Environmental Impact Report, October 2020 (hereinafter referred to as DEIR).

Los Angeles World Airport (LAWA) proposes to implement airfield, terminal and landside roadway improvements at LAX. The proposed project consists of several primary elements, (including airfield improvements) that would enhance operational management and safety within the airfield, new terminal facilities to upgrade passenger processing capabilities and enhance the passenger experience, and an improved system of the roadways to better access the Central Terminal Area (CTA) and new facilities while reducing congestion. It is anticipated that the project construction would occur from Year 2021 to Year 2028 (when full completion of the project is expected).

The project is an extensive multi-phase construction project which will occur over several years (2021 to 2028) and has the potential of impacting surrounding residential neighborhoods, schools and businesses from increased construction and operational noise.

The purpose of this letter is to review the DEIR from a noise impact standpoint and provide comments to help ensure that all potential impacts from the project are adequately identified and the effects mitigated to the maximum extent feasible.

## **Comments**

The following comments are offered with respect to the noise impacts of the LAX Airfield and Terminal Modernization Project DEIR:

1. Section 4.7.1.1.3, Effects of Noise on Humans. The DEIR delivers contradictory statements and appears to dismiss the widely recognized fact that environmental noise affects human health. Specifically, the statement on page 4.7.1-13 that says, “the effects of noise on health are too speculative for further evaluation in this CEQA document” is misleading. The California Noise Control Act explicitly declares that excessive noise is a serious hazard to the public health and exposure to certain levels of noise can result in physiological and psychological damage<sup>1</sup>. CEQA standards dictate that an EIR convey a meaningful idea of the health consequences from the project’s environmental impacts to allow for informed agency decision making and informed public participation. Therefore, the final EIR should take additional steps to correlate the potential health effects of noise exposure to the identified project impacts.
2. Section 4.7.1.2.3, Classroom Disruption. The DIER references noise level data from “LAX school sound insulation efforts” that shows the average noise reduction at schools near LAX is 29 dBA with windows closed. However, it does not provide the data to substantiate this statement. The widely accepted industry standard for exterior-to-interior noise reduction from building shell insulation is 20 dBA, as identified in Table 4.7.1-2. Therefore, additional evidence should be provided to support the use of 29 dBA exterior-to-interior noise reduction for schools. As will be seen, this assumption is a key factor in the assessment of impacts to classroom disruption. Furthermore, by using the average observed interior noise reduction, it is likely that potential building shell noise reduction at schools with inferior insulation would be overestimated. It is therefore recommended that the classroom disruption analysis be based on building performance for each specific classroom/building within the study area or utilize the industry standard 20 dBA noise reduction. As it is

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<sup>1</sup> California Health and Safety Code, Division 28. Noise Control Act, 4600, et.al.

now, the DEIR appears to be using overly generous assumptions and is not analyzing the full extent of potential impacts.

3. Section 4.7.1.3.2, Environmental Setting. In relationship to the issue of classroom disruption discussed in Comment #2, the DEIR does not substantiate the screening criteria of 84 and 94 dBA exterior exposure for schools to be below 55 dBA and 65 dBA in the classroom, respectively. Figure 4.7.1-6 and Table 4.7.1-6 identify 28 schools that are located within the existing LAX 65 dBA CNEL contour. Yet no evidence has been provided that shows that all of the school buildings in all of the 28 schools would provide at least 29 dBA of building insulation, as has been assumed in the study. Absent substantial evidence, the DEIR should assume a maximum exterior-to-interior building noise reduction of 20 dBA with windows closed. As a result, additional noise impacts may likely occur beyond what has been reported.
4. Section 4.7.1.3.2, Environmental Setting. The final EIR should provide a table indicating the exterior Lmax noise level exposure at all schools identified in Figure 4.7.1-6 and Table 4.7.1-6. Since this information is used as the basis for establishing the existing environmental setting and for analyzing the project's impact to school exposure, it is important that the data be provided for all sensitive noise receptors (schools) within the study area (65 dBA CNEL contour).
5. Section 4.7.1.5, Project Impacts. The DEIR fails to consider the full extent of project noise impacts by not analyzing long-term conditions (i.e. year 2045). The buildout noise analysis year in the DEIR is year 2028, yet as shown in Appendix B, Table 3-7, LAX is expected to generate an additional 165,316 annual aircraft operations in Year 2045, as compared to Year 2028. This would result in substantially higher noise levels and additional impacts beyond what has been analyzed in the EIR. To put it into perspective, the Hollywood Burbank Airport, which is one of the top 10 busiest airports in the State of California<sup>2</sup>, generated approximately 146,095 total annual aircraft operations last year<sup>3</sup>. Thus, a significant amount of planned growth, which can be directly and/or cumulatively attributed to the project, was not accounted for in the DEIR.

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<sup>2</sup> Federal Aviation Administration. Website:

[https://www.faa.gov/airports/planning\\_capacity/passenger\\_allcargo\\_stats/passenger/media/cy18-commercial-service-enplanements.pdf](https://www.faa.gov/airports/planning_capacity/passenger_allcargo_stats/passenger/media/cy18-commercial-service-enplanements.pdf)

<sup>3</sup> Hollywood Burbank Airport. Website: [https://hollywoodburbankairport.com/about-us/history\\_facts/](https://hollywoodburbankairport.com/about-us/history_facts/)



6. Section 4.7.1.5, Project Impacts. As discussed in Section 2.3.1.2.2, and supported by the data in Appendix B, “airfield congestion is not projected to be a constraint on growth until after year 2028”. Hence, one of the primary purposes of the airfield, terminal and landside improvements is to reduce potential constraints on growth after year 2028. Yet the DEIR conceals the long term impacts of the project by only analyzing near-term conditions in year 2028. Based on the data shown in Appendix B, Activity Forecasts Reports, the impacts of the “with project” versus “without project” scenarios would likely be much more substantial in year 2045 than in year 2028. The final EIR should address all reasonably foreseeable long term impacts (i.e. year 2045) from the project, as reported elsewhere in the DEIR.
7. Section 4.7.1.5, Project Impacts. Figures 4.7.1-7 through 4.7.1-10 show the 2028 Forecast “Proposed Project” CNEL Contours (65-75 dB). However, upon review of the CNEL contour map, there is no change in noise levels in the vicinity of the proposed Terminal 9 and Concourse 0. This seems unlikely, especially near Concourse 0, which would be replacing an existing parking lot with an active terminal for Southwest Airlines. Given the close proximity to the existing Hyatt Regency Hotel and neighboring office buildings along Sepulveda Boulevard, further detail of the potential noise impacts from planes taxing in and out of the area should be provided.
8. Section 4.7.2, Roadway Noise. The computed noise levels shown in Table 4.7.2-3, 4.7.2-4, and 4.7.2-5 cannot be verified as there is limited supporting data provided in Appendix F. For example, the actual ADT along roadway segments does not appear to be provided.
9. Section 4.7.3, Construction Traffic and Equipment Noise and Vibration. The DEIR incorrectly utilizes 24-hour CNEL noise levels to evaluate whether construction activities would exceed the ambient noise level by 5 dBA at a noise sensitive use between the hours of 9:00 p.m. and 7:00 a.m. Monday through Friday or before 8:00 a.m. or after 6:00 p.m. on Saturday, or at any time on Sunday. The impact analysis should be based upon actual field measured Leq noise levels during nighttime hours only to determine significance during the nighttime hours. The existing CNEL noise levels shown in Table 4.7.3-1 do not represent the actual nighttime noise levels near the noise sensitive receptors. Nighttime noise levels are significantly quieter than what has been reported using the CNEL metric. Thus, the

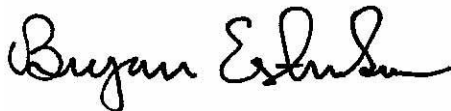
findings shown in Table 4.7.3-5 are not accurate and additional noise impacts would be expected.

10. Section 4.7.3.5.2.2, Mitigation Measures. The DEIR does not include all reasonably feasible mitigation measures for reducing potential noise impacts. The Construction Noise Control Plan should include a requirement for active construction noise monitoring at adjacent noise sensitive receptors anytime construction activities take place during nighttime hours. Active nighttime noise monitoring would help ensure actual construction noise levels (not based on computer models) do not exceed the nighttime noise standards in the City of Los Angeles or exceed existing ambient nighttime noise levels by more 5 dBA. The monitoring program should monitor and establish the adequate baseline noise levels for each receptor prior to commencing any activity. The monitoring program should also notify construction management personnel when noise levels approach and/or exceed the applicable thresholds. Construction activity should cease or be modified in order to ensure violations do not occur. Repeated violations should result in fines or other penalties.

## **Conclusions**

RK appreciates the opportunity to work with the LAW OFFICE OF GIDEON KRACOV in reviewing the LAX Airfield and Terminal Modernization Project DEIR. If you have any questions please give call at (949) 474-0809

Sincerely,



Bryan Estrada, AICP, PTP  
Principal

*rk16435.doc*  
*JN:2952-2020-02*

## Bryan Estrada, AICP, PTP

Principal

### Areas of Expertise

Transportation and Environmental Planning  
Transportation Demand Management  
Traffic Impact Studies  
Parking Studies  
Air Quality Analysis  
Greenhouse Gas/Global Climate Change Analysis  
Environmental Acoustics/Noise Analysis  
CEQA Compliance  
Synchro Traffic Analysis Software  
California Emissions Estimator Model (CalEEMod)  
FHWA Noise Modeling  
SoundPLAN Software  
AutoCAD

### Education and Training

University of California, Irvine, B.A., Urban Studies  
California Air Resources Board, Air Quality Training Program  
Geo Instruments Vibration Monitoring Short Course

### Professional History

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Principal  
2007 - Present

### Certificates and Affiliations

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Professional Transportation Planner (PTP)  
American Planning Association  
Association of Environmental Professionals

### Representative Experience

Mr. Bryan Estrada is a native of Southern California and also stayed in the area by attending the University of California, Irvine, School of Planning, Policy and Design where he received a Bachelor of Arts degree in Urban Studies. Mr. Estrada's multidisciplinary background is concentrated around current transportation challenges and their environmental impacts within urban areas. Mr. Estrada is committed to sustainable development practices, transportation demand management, and global climate change awareness.

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Mr. Estrada's experience includes traffic/transportation planning, air quality and greenhouse gas analysis, and environmental acoustics/noise analysis. He has also contributed to the design and construction of traffic signal plans, signing and striping plans and traffic control plans. He is regularly out in the field performing assessments and inventories of project sites and meeting with community stakeholders.

Mr. Estrada works on transportation and environmental planning projects that range from focused site-specific technical studies to regional and General Plan level analyses. His recent work includes Mixed Use Development projects in Downtown Huntington Beach, the City of Aliso Viejo General Plan Update and Aliso Viejo Town Center Vision Plan, Eleanor Roosevelt High School eStem Academy Traffic Impact Study and On-Site Circulation Plan (Eastvale, CA), Great Wolf Lodge Resort (Garden Grove, CA), Starbucks Coffee Shops (multiple locations through Southern California), Paradise Knolls Specific Plan (Jurupa Valley, CA), Vista Del Agua Specific Plan (Coachella, CA), and Monterey Park Hotel Mixed Use Development Project (Monterey Park, CA).

Mr. Estrada has obtained the American Institute of Certified Planners (AICP) certification granted by the American Planning Association and the Professional Transportation Planner (PTP) certification granted by the Transportation Professional Certification Board.

**EXHIBIT C**



Technical Consultation, Data Analysis and  
Litigation Support for the Environment

2656 29<sup>th</sup> Street, Suite 201  
Santa Monica, CA 90405

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March 15, 2021

Jordan Sisson  
Law Office of Gideon Kracov  
801 S. Grand Ave., 11<sup>th</sup> Floor  
Los Angeles, CA 90017

**Subject:           Comments on the Airfield & Terminal Modernization Project (SCH No. 2019049020)**

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Dear Mr. Sisson,

We have reviewed the October 2020 Draft Environmental Impact Report (“DEIR”) for the Airfield & Terminal Modernization Project (“Project”) located in the City of Los Angeles (“City”). The Project proposes the development of Taxiway D Extension West, Runway 6L-24R Exits, Concourse 0, Terminal 9, as well as the removal and replacement of 15 of the 18 West Remote Gates and roadway system improvements, on the 3,800-acre airport property.

Our review concludes that the DEIR fails to adequately evaluate the Project’s air quality, health risk, and greenhouse gas impacts. As a result, emissions and health risk impacts associated with construction and operation of the proposed Project are underestimated and inadequately addressed. An updated EIR should be prepared to adequately assess and mitigate the potential air quality, health risk, and greenhouse gas impacts that the project may have on the surrounding environment.

## **Air Quality**

### **Inadequate Analysis of Architectural Coating Emissions**

The Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy (“AQ & GHG Report”), provided as Appendix C to the DEIR, estimates that architectural coating activities associated with the proposed Concourse 0 East Interior Fit-Out, Concourse 0 West Interior Fit-Out, Terminal 9 East Fit-Out, and Terminal 9 West Fit-Out would result in VOC emissions of 12-, 16-, 13-, and 13-pounds per day (“lbs/day”), respectively (Appendix C, pp. 29). However, the AQ & GHG Report’s analysis of the

Project’s architectural coating-related VOC emissions is unsubstantiated, as it relies upon an underestimated Concourse 0 land use size.

Specifically, the DEIR indicates that Concourse 0 would include 745,000-SF of concourse/passenger operations and 318,000-SF of office space for administrative purposes, thus resulting in a total land use size of 1,063,000-SF (p. 1-6). As such, the AQ & GHG Report’s analysis of the Project’s architectural coating emissions should have relied upon a land use size of 1,063,000-SF for Concourse 0. However, review of the AQ & GHG Report demonstrates that the analysis assumes that Concourse 0 East and Concourse 0 West would each only be 372,500-SF, for a total of 745,00-SF (see excerpt below) (Appendix C, pp. 29).

| Project # | Project Description      | Total Building Area (sqft) |
|-----------|--------------------------|----------------------------|
| 23        | C0 East Interior Fit-Out | 372,500                    |
| 42        | C0 West Interior Fit-Out | 372,500                    |
| 72        | Terminal 9 East Fit-Out  | 600,345                    |
| 86        | Terminal 9 West Fit-Out  | 600,345                    |

As demonstrated above, the analysis of Concourse 0 fails to include the proposed office space, underestimating the land use size by 318,000-SF. As a result, the AQ & GHG Report’s analysis of the Project’s architectural coating emissions is inconsistent with the information provided by the DEIR. Thus, by underestimating the size of Concourse 0, the AQ & GHG Report underestimates the VOC emissions associated with the Project’s architectural coating activities and should not be relied upon to determine Project significance.

### Failure to Adequately Analyze Construction Trips

While the AQ & GHG Report considers the construction-related emissions associated with worker trips, it fails to consider emissions associated with hauling and vendor trips required by Project construction (Appendix C.1, pp. 146-153). This is incorrect, as vendor and hauling, as well as worker, trips result in short-term construction-related emissions associated with on-road vehicles.<sup>1</sup> Thus, by failing to consider the hauling and vendor trips required for Project construction, the AQ & GHG Report underestimates the Project’s construction-related emissions and should not be relied upon to determine Project significance.

### Failure to Evaluate All Operational Emission Sources

Regarding the Project’s operational emissions, the DEIR states:

“Sources of operational emissions evaluated in the analysis include aircraft engines and auxiliary power units (APUs); ground support equipment (GSE); ground vehicles used to transport passengers, cargo, and supplies to and from the airport; stationary water and space heaters; emergency generators; and indirect GHG emissions from electrical demand” (p. 4.4-5).

<sup>1</sup> “CalEEMod User Guide.” available at: <http://www.caleemod.com/>, p. 2.

However, the DEIR's analysis of the Project's operational emissions fails to take into account emissions associated with water usage and solid waste disposal.<sup>2</sup> This presents an issue, as supplying and treating water, as well as disposing of solid waste, throughout Project operation contributes to operational greenhouse gas ("GHG") emissions.<sup>3</sup> Thus, by failing to consider emissions associated with solid waste and water, the AQ & GHG Report underestimates the Project's operational GHG emissions and should not be relied upon to determine Project significance.

### Failure to Implement All Feasible Mitigation to Reduce Emissions

As discussed above, the DEIR relies upon an unsubstantiated analysis of the Project's emissions. However, despite the DEIR's flawed emissions analysis, the DEIR's construction-related and operational emissions estimates indicate a significant air quality impact. Specifically, regarding the Project's construction-related criteria air pollutant emissions, the DEIR states:

"With implementation of Mitigation Measures MM-AQ/GHG (ATMP)-1 and 2, significant impacts associated with construction emissions would be reduced, but not to a level that would be less than significant. Specifically, even with implementation of all feasible construction-related mitigation measures, the proposed Project-related estimated incremental increases in construction-related emissions of CO, VOC, NOX, and SOX would exceed the daily emission thresholds established by SCAQMD. The emissions of CO, VOC, and SOX would exceed the construction emission thresholds during the periods when one of the north runways is closed to safely tie-in the Taxiway D extension. The runway closure period would require aircraft to taxi farther to the open runways. Once these connections are completed, taxi times would drop and would be similar to Without Project taxi times. Although these runway closures would be temporary (approximately 4 to 5 months in two different years) relative to the total proposed Project construction duration, they do represent peak day total construction emissions for all pollutants. Construction emissions of NOX would exceed the construction emission thresholds in several years that do not include the runway closures. No other feasible mitigation measures have been identified that would further reduce these impacts to air quality. Therefore, impacts to air quality from Project-related construction emissions would be **significant and unavoidable**" (p. 4.1.1-43 – 4.1.1-44).

Furthermore, regarding the Project's operational criteria air pollutant emissions, the DEIR states:

"With implementation of Mitigation Measures MM-AQ/GHG (ATMP)-3 through 7 and MM-T (ATMP)-1, significant impacts associated with operational emissions would be reduced, but not to a level that would be less than significant. Specifically, even with implementation of all feasible operations-related mitigation measures, the Project-related estimated incremental increases in daily operations-related emissions of NOX, SOX, PM10, and PM2.5 would exceed the daily emission thresholds established by SCAQMD. No other feasible mitigation measures have been identified at this time that would further reduce impacts to air quality. Therefore,

<sup>2</sup> "CalEEMod User Guide." available at: <http://www.caleemod.com/>, p. 2.

<sup>3</sup> "CalEEMod User Guide." available at: <http://www.caleemod.com/>, p. 44, 46.

impacts to air quality from Project-related operational emissions would be **significant and unavoidable**” (p. 4.1.1-50).

However, while we agree that the Project’s construction-related and operational criteria air pollutant emissions would result in significant air quality impacts, the DEIR’s conclusion that these impacts are “significant and unavoidable” is incorrect. According to CEQA Guidelines § 15096(g)(2):

“When an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment.”

As you can see, an impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. However, while the DEIR includes MM-AQ/GHG (ATMP)-1 through 7, as well as MM-T (ATMP)-1, the DEIR fails to implement all feasible mitigation (p. 4.1.1-43, 4.1.1-49). Therefore, the DEIR’s conclusion that the Project’s air quality impacts are significant and unavoidable is unsubstantiated. To reduce the Project’s air quality impacts to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled “Feasible Mitigation Measures Available to Reduce Emissions.”<sup>4</sup> Thus, the Project should not be approved until an updated EIR is prepared, including updated, accurate air modeling, as well as incorporating all feasible mitigation to reduce emissions to less-than-significant levels.

### Diesel Particulate Matter Health Risk Emissions Inadequately Evaluated

The DEIR concludes that the Project’s health risk impacts would be less-than-significant as a result of quantitative construction and operational health risk assessments (“HRAs”) (p. 4.1.2-14, 4.1.2-16). Specifically, the DEIR estimates the following cumulative cancer risks (see excerpt below) (p. 4.1.2-14, Table 4.1.2-2):

| Receptor Type                | Cancer Risks <sup>1,2,3,4</sup><br>(per million people) | Threshold<br>(per million people) | Equal to or Exceeds<br>Threshold? |
|------------------------------|---|-----------------------------------|-----------------------------------|
| Off-Airport Worker, 25 years | 5   | 10                                | No                                |
| Adult Resident, 70 years     | -2  | 10                                | No                                |
| Adult Resident, 30 years     | -1  | 10                                | No                                |
| Child Resident, 9 years      | -0.1  | 10                                | No                                |
| School Child, 12 years       | -0.2  | 10                                | No                                |

However, the DEIR’s analysis of the Project’s health risk impacts, as well as the subsequent less-than-significant impact conclusion, is incorrect for three reasons.

<sup>4</sup> See section titled “Feasible Mitigation Measures Available to Reduce Emissions” on p. 12 of this comment letter. These measures would effectively reduce construction-related and operational criteria air pollutant emissions.



First, the DEIR’s analysis of the Project’s toxic air contaminant (“TAC”) emissions is incorrect, as it relies upon a flawed analysis of the Project’s emissions. As previously discussed, when we reviewed the DEIR’s analysis of the Project’s emissions, provided in the AQ & GHG Report as Appendix C to the DEIR, we found several inadequacies, as well as inconsistencies with the information disclosed in the DEIR and associated documents. As a result, the DEIR’s HRA utilizes underestimated TAC emissions estimates to calculate the cancer risk associated with Project construction and operation. As a result, the DEIR may underestimate the Project’s construction-related and operational cancer risks and should not be relied upon to determine Project significance.

Second, the Human Health Risk Assessment Technical Report (“HRA Report”), provided as Appendix C.6 to the DEIR, provides the total emissions used in the dispersion analysis of construction sources (see excerpt below) (Appendix C.6, p. 3-2).

**Table 3-1 On-Airport Construction TOG and PM<sub>10</sub> Emissions for the Proposed Project**

| Averaging Period                                    | PM <sub>10</sub>      |                         |               |                   | TOG                   |                         |                  | Comments                                  |
|---|-----------------------|-------------------------|---------------|-------------------|-----------------------|-------------------------|------------------|---|
|   | Diesel Engine Exhaust | Gasoline Engine Exhaust | Fugitive Dust | Tire & Brake Wear | Diesel Engine Exhaust | Gasoline Engine Exhaust | Paving & Coating |   |
| Peak Daily (lbs)                                    | 5.84                  | 0.05                    | 18.78         | 0.72              | 36.25                 | 1.26                    | 47.64            | Used for Acute Non-Cancer Health Hazard   |
| Peak Annual (tons)                                  | 0.53                  | 0.01                    | 1.88          | 0.07              | 3.24                  | 0.13                    | 4.33             | Used for Chronic Non-Cancer Health Hazard |
| Average for 14-year Construction Period (tons/year) | 0.21                  | <0.01                   | 0.62          | 0.03              | NA                    | 0.05                    | 1.08             | Used for Cancer Risk                      |

However, the HRA Report fails to provide the total emissions used in the dispersion analysis of operational sources. As a result, we cannot verify the DEIR’s operational HRA, and the DEIR’s less-than-significant impact conclusion should not be relied upon.

Third, in order to evaluate the Project’s criteria air pollutant emissions, the DEIR compares the 2028 Project scenario with the 2018 baseline scenario, as well as the 2028 with Project scenario to the 2028 without Project scenario (p. 4.1.1-34). However, in order to evaluate the Project’s TAC emissions, the DEIR compares the 2028 Project scenario with the 2018 baseline scenario, as well as the 2028 without Project scenario to the 2018 baseline scenario (see excerpt below) (p. 4.1.2-19, Table 4.1.2-4).

| Table 4.1.2-4<br>Incremental Cancer Risks for Maximally Exposed Individuals for 2028 With Project Operations Compared to 2018 Baseline and 2028 Without Project Compared to 2018 Baseline |   |   |
|---|---|---|
| Receptor Type   | Incremental Cancer Risks <sup>1,2,3,4</sup><br>(per million people) |   |
|   | 2028 With Project Operations Compared to 2018 Baseline              | 2028 Without Project Operations Compared to 2018 Baseline |
| Off-Airport Worker, 25 years  | 5   | -0.2  |
| Adult Resident, 70 years  | -4  | -4  |
| Adult Resident, 30 years  | -4  | -3  |
| Child Resident, 9 years   | -3  | -2  |
| School Child, 12 years  | -1  | -0.9  |

Source: Appendix C.6 of this EIR.

Notes:

- <sup>1</sup> It was assumed that for operations, receptors are exposed to operations-related TAC beginning in 2028 and continuing through the remainder of the receptors' exposure periods.
- <sup>2</sup> Maximally Exposed Individual (MEI) locations are shown on Figure 4.1.2-4.
- <sup>3</sup> The MEI value for the school child cancer risk is at a residential/commercial grid location and not at an existing school location. The highest estimated cancer risk for school children at an existing school is estimated to be -1 in 1 million at Cowan Avenue Elementary School (the school at grid point 176).
- <sup>4</sup> Negative values indicate a beneficial impact.

As demonstrated in the table above, the DEIR compares the 2028 Project scenario with the 2018 baseline scenario, as well as the 2028 without Project scenario to the 2018 baseline scenario, and ultimately concludes that Project operation would result in a negative cancer risk (i.e. a beneficial impact). Furthermore, the estimated 70-year adult resident, 30-year adult resident, 9-year child resident, and 12-year school child cancer risks are negative *regardless of whether or not the Project is approved*. Given that the majority of estimated cancer risks are negative with or without the proposed Project, the use of the 2018 baseline scenario may be misleading. According to the Association of Environmental Professionals (“AEP”) *CEQA Portal Topic Paper* on “Baseline and Environmental Setting”:

“For projects that may be implemented over a period of years, or even decades, simply comparing the effects of such a project to a baseline representing existing conditions may not provide a full and accurate picture of the project’s impacts.”<sup>5</sup>

As the proposed Project would be implemented over a period of 7 years, the DEIR should have compared the TAC emissions associated with the 2028 With Project Operations scenario to the 2028 Without Project Operations scenario, consistent with the DEIR’s analysis of the Project’s operational criteria air pollutant emissions. By failing to consider a baseline scenario that provides a full and accurate picture of the Project’s impacts, the DEIR may underestimate the Project’s operational health risk impacts and should not be relied upon.

<sup>5</sup> “Baseline and Environmental Setting.” AEP, August, 2016, available at: <https://cegaportal.org/tp/Baseline%20and%20Environmental%20Setting%20Topic%20Paper%2008-23-16.pdf>, p. 3.

### Failure to Consider Long-Term Impacts

The DEIR fails to consider the full extent of the Project’s operational air quality impacts by failing to analyze long-term conditions. The buildout year analyzed in the DEIR’s air quality analysis is 2028 (see excerpt below) (p. 4.1.2-19, Table 4.1.2-4).

| Receptor Type                | Incremental Cancer Risks <sup>1,2,3,4</sup><br>(per million people) |   |
|------------------------------|---|---|
|                              | 2028 With Project Operations Compared to 2018 Baseline              | 2028 Without Project Operations Compared to 2018 Baseline |
| Off-Airport Worker, 25 years | 5   | -0.2  |
| Adult Resident, 70 years     | -4  | -4  |
| Adult Resident, 30 years     | -4  | -3  |
| Child Resident, 9 years      | -3  | -2  |
| School Child, 12 years       | -1  | -0.9  |

Source: Appendix C.6 of this EIR.

Notes:

- <sup>1</sup> It was assumed that for operations, receptors are exposed to operations-related TAC beginning in 2028 and continuing through the remainder of the receptors’ exposure periods.
- <sup>2</sup> Maximally Exposed Individual (MEI) locations are shown on Figure 4.1.2-4.
- <sup>3</sup> The MEI value for the school child cancer risk is at a residential/commercial grid location and not at an existing school location. The highest estimated cancer risk for school children at an existing school is estimated to be -1 in 1 million at Cowan Avenue Elementary School (the school at grid point 176).
- <sup>4</sup> Negative values indicate a beneficial impact.

However, as demonstrated in the Activity Forecasts and Operational Analyses, provided as Appendix B to the DEIR, the Project is expected to generate an additional 165,316 annual aircraft operations in 2045, when compared to 2028 (see excerpt below) (p. 3-12, Table 3-7).

**TABLE 3-7 HISTORICAL AND UNCONSTRAINED FORECAST TOTAL UNSCHEDULED OPERATIONS**

| FISCAL YEAR <sup>1</sup>            | AIRCRAFT OPERATIONS      |                    | SHARE                    |
|-------------------------------------|--------------------------|--------------------|--------------------------|
|                                     | UNSCHEDULED <sup>2</sup> | TOTAL <sup>3</sup> | UNSCHEDULED <sup>4</sup> |
| Unconstrained Forecast <sup>5</sup> |                          |                    |                          |
| 2018                                | 71,454                   | 714,543            | 10.0%                    |
| 2023                                | 75,190                   | 751,901            | 10.0%                    |
| 2028                                | 79,984                   | 799,843            | 10.0%                    |
| 2033                                | 85,347                   | 853,471            | 10.0%                    |
| 2038                                | 90,240                   | 902,401            | 10.0%                    |
| 2043                                | 94,735                   | 947,345            | 10.0%                    |
| 2045                                | 96,516                   | 965,159            | 10.0%                    |

Thus, the DEIR’s Activity Forecasts and Operational Analyses indicates a significant amount of planned growth, which was not accounted for in the DEIR’s air quality analysis. By failing to analyze the Project’s long-term operational air quality impacts, the DEIR fails to consider the full extent of the Project’s operational air quality impacts and should not be relied upon.

## Greenhouse Gas

### Failure to Adequately Evaluate Greenhouse Gas Impacts

The DEIR estimates that the Project would generate net annual GHG emissions of 204,877 metric tons of carbon dioxide equivalents per year (“MT CO<sub>2</sub>e/year”), or an increase of 9.5% from baseline conditions, which indicates a significant GHG impact (see excerpt below) (p. 4.4-29, Table 4.4-5).

**Table 4.4-5  
Construction (Amortized) and Operational GHG Emissions for the Proposed Project as Compared to 2018 Baseline Conditions**

| Emission Source           | Baseline Conditions (2018) |                  | Proposed Project (2028) |                  | Incremental Difference  |                |
|---------------------------|----------------------------|------------------|-------------------------|------------------|-------------------------|----------------|
|                           | MT/Yr CO <sub>2</sub> e    | Percent of Total | MT/Yr CO <sub>2</sub> e | Percent of Total | MT/Yr CO <sub>2</sub> e | Percent Change |
| Aircraft                  | 930,589                    | 43               | 1,142,950               | 48               | 212,362                 | 22.8           |
| APUs                      | 45,135                     | 2                | 48,941                  | 2                | 3,806                   | 8.4            |
| GSE                       | 27,723                     | 1                | 19,626                  | 1                | (8,098)                 | (29.2)         |
| Stationary                | 97,397                     | 5                | 107,490                 | 5                | 10,093                  | 10.4           |
| Autos                     | 1,020,793                  | 47               | 1,005,382               | 43               | (15,410)                | (1.5)          |
| Parking                   | 30,186                     | 1                | 28,742                  | 1                | (1,444)                 | (4.8)          |
| Construction <sup>1</sup> | --                         | --               | 3,568                   | <1               | 3,568                   | 100            |
| <b>TOTALS<sup>2</sup></b> | <b>2,151,823</b>           | <b>100</b>       | <b>2,356,700</b>        | <b>100</b>       | <b>204,877</b>          | <b>9.5</b>     |

As a result, the DEIR includes MM-AQ/GHG (ATMP)-1 through MM-AQ/GHG (ATMP)-6 and MM-GHG (ATMP)-1 through MM-GHG (ATMP)-5 (p. 4.4-31 - 4.4-32). However, after the implementation of these mitigation measures, the DEIR concludes that the Project’s GHG emissions would be significant and unavoidable, stating:

“The proposed Project would generate GHG emissions directly and indirectly that would have a significant impact on the environment. Mitigation Measures MM-AQ/GHG (ATMP)-1 through MM-AQ/GHG (ATMP)-6, MM-GHG (ATMP)-1 through MM-GHG (ATMP)-5, and MM-T (ATMP)-1 would reduce GHG emissions associated with construction and operation of the proposed Project. However, the vast majority of GHG emissions associated with operation of the proposed Project in 2028 would occur with or without Project implementation and are from aircraft, which LAWA does not own and has no authority to control (i.e., Scope 3 GHG emissions). As described in Section 4.1.1, Air Quality, the USEPA establishes the overall policies and regulations for protecting air quality nationwide, which include setting standards for stationary (e.g., power plants, industrial boilers, incinerators) and mobile (e.g., motor vehicles, off/non-road vehicles, aircraft engines) sources of pollutant emissions, including GHG emissions. Section 233 of the federal Clean Air Act exclusively vests the authority to promulgate emission standards for

aircraft and aircraft engines with the USEPA; states and other municipalities are preempted from adopting or enforcing any standard with respect to aircraft engine emissions unless such standard is identical to the USEPA's standards. Implementation of the proposed mitigation measures would reduce Project-related GHG emissions, but not to a level that would be less than significant. No other feasible mitigation measures have been identified that would further reduce GHG impacts. Therefore, impacts associated with Project-related GHG emissions would remain ***significant and unavoidable***" (p. 4.4-33 - 4.4-34).

Furthermore, the DEIR evaluates the Project's consistency with Executive Orders S-3-05, B-30-15, and B-55-18; CARB's 2017 Climate Change Scoping Plan and the City of Los Angeles' Sustainable City pLAn/Green New Deal (p. 4.4-38). However, based on numerous conflicts with these plans, the DEIR concludes that the Project's GHG impact would be significant and unavoidable, stating:

"Implementation of Mitigation Measures MM-AQ/GHG (ATMP)-1 through MM-AQ/GHG (ATMP)-6, MM-GHG (ATMP)-1 through MM-GHG (ATMP)-5, and MM-T (ATMP)-1, presented above in the discussion of Impact 4.4-1, would reduce GHG emissions associated with construction and operation of the proposed Project. However, as noted in that discussion, even with implementation of these mitigation measure, Project-related GHG emissions would be significant and unavoidable. The reduction in emissions resulting from Mitigation Measures MM-AQ/GHG (ATMP)-1 through MM-AQ/GHG (ATMP)-6, MM-GHG (ATMP)-1 through MM-GHG (ATMP)-5, and MM-T (ATMP)-1 would reduce the severity of Project-related conflicts with certain applicable plans, policies, and regulations adopted for the purpose of reducing emissions of GHG, but would not eliminate these conflicts. Therefore, impacts of the proposed Project with respect to applicable plans, policies, and regulations adopted for the purpose of reducing the emissions of GHGs would remain ***significant and unavoidable***" (p. 4.4-38).

However, the DEIR's analysis of the Project's GHG impact, as well as the subsequent significant-and-unavoidable GHG impact conclusion, is incorrect for three reasons.

- (1) The DEIR's quantitative GHG analysis relies upon an unsubstantiated analysis of emissions;
- (2) The DEIR fails to implement all feasible mitigation to reduce the Project's GHG emissions; and
- (3) The DEIR fails to consider the performance-based standards under CARB's 2017 *Scoping Plan*.

#### *(1) Incorrect and Unsubstantiated Quantitative GHG Analysis*

As discussed above, the DEIR estimates that the Project would generate net annual GHG emissions of 204,877 MT CO<sub>2</sub>e/year (p. 4.4-29, Table 4.4-5). However, the DEIR's quantitative GHG analysis should not be relied upon, as it relies upon an unsubstantiated analysis of the Project's emissions. As previously discussed, when we reviewed the DEIR's analysis of the Project's emissions, provided in the AQ & GHG Report as Appendix C to the DEIR, we found several inadequacies, as well as inconsistencies with the information disclosed in the DEIR and associated documents. As a result, the DEIR's quantitative GHG analysis may underestimate the Project's GHG emissions and should not be relied upon to determine Project significance. An updated EIR should be prepared that adequately assesses the potential GHG

impacts that construction and operation of the proposed Project may have on the surrounding environment.

*(2) Failure to Implement All Feasible Mitigation to Reduce GHG Emissions*

As discussed above, the DEIR's GHG analysis relies upon a flawed analysis of the Project's emissions. However, despite the DEIR's flawed air model, the DEIR's GHG emissions estimates indicate a significant GHG impact. As a result, the DEIR concludes that the proposed Project's GHG emissions would be significant and unavoidable (p. 4.4-33 - 4.4-34). However, while we agree that the Project's GHG emissions would be significant, the DEIR's conclusion that these impacts are "significant and unavoidable" is incorrect. According to CEQA Guidelines § 15096(g)(2):

"When an EIR has been prepared for a project, the Responsible Agency shall not approve the project as proposed if the agency finds any feasible alternative or feasible mitigation measures within its powers that would substantially lessen or avoid any significant effect the project would have on the environment."

As you can see, an impact can only be labeled as significant and unavoidable after all available, feasible mitigation is considered. However, while the DEIR implements Mitigation Measures MM-AQ/GHG (ATMP)-1 through MM-AQ/GHG (ATMP)-6, MM-GHG (ATMP)-1 through MM-GHG (ATMP)-5, and MM-T (ATMP)-1, the DEIR fails to implement *all feasible* mitigation (p. 4.4-31- 4.4-33). Therefore, the DEIR's conclusion that the Project's GHG impact is significant and unavoidable is unsubstantiated. To reduce the Project's GHG emissions to the maximum extent possible, additional feasible mitigation measures should be incorporated, such as those suggested in the section of this letter titled "Feasible Mitigation Measures Available to Reduce Emissions."<sup>6</sup> Thus, the Project should not be approved until an updated EIR is prepared, including updated, accurate air modeling, as well as incorporating *all feasible* mitigation to reduce emissions to less-than-significant levels.

*(3) Failure to Consider Performance-Based Standards Under CARB's 2017 Scoping Plan*

As previously mentioned, the Project relies upon the Project's consistency with CARB's 2017 *Scoping Plan* in order to determine Project significance. However, review of the Project documents demonstrates that the DEIR fails to consider the performance-based standards under the CARB's 2017 *Scoping Plan*.

***i. Passenger & Light Duty VMT Per Capita Benchmarks per SB 375***

In reaching the State's long-term GHG emission reduction goals, CARB's 2017 *Scoping Plan* explicitly cites to SB 375 and the VMT reductions anticipated under the implementation of Sustainable Community Strategies.<sup>7</sup> CARB has identified the population and daily VMT from passenger autos and light-duty vehicles at the state and county level for each year between 2010 to 2050 under a "baseline scenario" that includes "current projections of VMT included in the existing Regional Transportation

<sup>6</sup> See section titled "Feasible Mitigation Measures Available to Reduce Emissions" on p. 12 of this comment letter. These measures would effectively reduce the Project's GHG emissions.

<sup>7</sup> "California's 2017 Climate Change Scoping Plan." CARB, November 2017, *available at*: [https://ww3.arb.ca.gov/cc/scopingplan/scoping\\_plan\\_2017.pdf](https://ww3.arb.ca.gov/cc/scopingplan/scoping_plan_2017.pdf), p. 25, 98, 101-103.

Plans/Sustainable Communities Strategies (RTP/SCSs) adopted by the State’s 18 Metropolitan Planning Organizations (MPOs) pursuant to SB 375 as of 2015.”<sup>8</sup> By dividing the projected daily VMT by the population, we calculated the daily VMT per capita at the county level for 2030 (target year under SB 32) (see table below and Attachment A).

| 2017 Scoping Plan Daily VMT Per Capita |            |                  |                |
|--|------------|------------------|----------------|
| Los Angeles County                     |            |                  |                |
| Year                                   | Population | LDV VMT Baseline | VMT Per Capita |
| 2030                                   | 10,868,614 | 215,539,586      | 19.83          |

The DEIR implements MM-T (ATMP)-1, which requires the implementation of a VMT reduction program resulting in a 20.4 VMT per employee value (p. 4.8-56). The below table compares the 2017 *Scoping Plan* daily VMT per capita value against the DEIR’s daily VMT per capita value (see table below and Attachment A).

| Daily VMT Per Capita from Passenger & Light-Duty Trucks,<br>Exceedances under 2017 Scoping Plan Performance-Based SB 375 Benchmarks |               |
|---|---------------|
| Sources   | DEIR Modeling |
| Daily VMT Per Capita  | 20.40         |
| 2017 Scoping Plan Benchmarks, Los Angeles County Specific   |               |
| 19.83 VMT (2030 Projected) Exceed?  | Yes           |

As shown above, the DEIR’s daily VMT per capita exceeds the CARB 2017 *Scoping Plan* projection for Los Angeles County for 2030. Because the exceeds the CARB 2017 *Scoping Plan* performance-based daily VMT per capita projection, the Project conflicts with the CARB 2017 *Scoping Plan*. As such, a Project-specific EIR should be prepared for the proposed Project to provide additional information and analysis evaluating the Project’s consistency with CARB’s 2017 *Scoping Plan*.

*(4) Failure to Consider Performance-based Standards under SCAG’s RTP/SCS*

The DEIR fails to consider the Project’s consistency with SCAG’s 2020-2045 *RTP/SCS* in order to determine the significance of the Project’s GHG impact. Specifically, review of the Project documents demonstrates that the DEIR fails to consider the performance-based standards under SCAG’s 2020-2045 *RTP/SCS*, such as daily vehicle miles traveled (“VMT”) per capita benchmarks.

<sup>8</sup> “Supporting Calculations for 2017 Scoping Plan-Identified VMT Reductions,” Excel Sheet “Readme.” CARB, January 2019, available at: [https://ww2.arb.ca.gov/sites/default/files/2019-01/sp\\_mss\\_vmt\\_calculations\\_jan19\\_0.xlsx](https://ww2.arb.ca.gov/sites/default/files/2019-01/sp_mss_vmt_calculations_jan19_0.xlsx).

**i. SB 375 RTP/SCS Daily VMT Per Capita Target**

Under the SCAG’s 2020 RTP/SCS, daily VMT per capita in Los Angeles County should decrease to 19.2 VMT by 2045.<sup>9</sup> Here, however, the DEIR fails to consider any of the abovementioned performance-based VMT targets.

As previously stated, the DEIR implements MM-T (ATMP)-1, which requires the implementation of a VMT reduction program resulting in a 20.4 VMT per employee value (p. 4.8-56). The below table compares the SCAG’s 2020 RTP/SCS daily VMT per capita value for 2045 against the DEIR’s daily VMT per capita value (see table below and Attachment A).

| Daily VMT Per Capita from Passenger & Light-Duty Trucks,  |       |
|---|-------|
| Exceedances under RTP/SCS Performance-Based SB 375 Target |       |
| DEIR Modeling   |       |
| Daily VMT Per Capita                                      | 20.40 |
| 2020 RTP/SCS Benchmark, Los Angeles County                |       |
| 19.2 VMT (2045 Target) Exceed?                            | Yes   |

As shown in the above table, the DEIR’s daily VMT per capita value of 20.40 exceeds the Los Angeles County-specific target for 2045 under SCAG’s 2020-2045 RTP/SCS. Thus, based on the DEIR’s estimate, the Project would exceed the 2045 target VMT per capita value for Los Angeles County, indicating that the Project conflicts with the SCAG’s RTP/SCS and SB 375.

**Feasible Mitigation Measures Available to Reduce Emissions**

As previously described, the Project may result in potentially significant air quality, health risk, and GHG impacts that should be mitigated further. In an effort to reduce the Project’s emissions, we identified several mitigation measures that are applicable to the proposed Project.

First, feasible mitigation measures can be found in the September 2019 Recirculated Draft Environmental Impact Report for the San Diego International Airport’s Airport Development Plan.<sup>10</sup> Therefore, to reduce the Project’s emissions, consideration of the following measures should be made:

- Ground Support Equipment Conversion:
  - Transition all baggage tugs, belt loaders, lifts, pushback tractors, and utility carts at SDIA that are owned and operated by airlines and their ground handling contractors to service aircraft, shall be transitioned to alternative fuels (i.e., electric, natural gas, renewable diesel, biodiesel).

<sup>9</sup> “Connect SoCal.” SCAG, September 2020, available at: [https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan\\_0.pdf?1606001176](https://scag.ca.gov/sites/main/files/file-attachments/0903fconnectsocial-plan_0.pdf?1606001176), pp. 138.

<sup>10</sup> “Recirculated Draft EIR for the Airport Development Plan.” San Diego International Airport, September 2019, available at: [https://files.ceqanet.opr.ca.gov/139992-3/attachment/Qtt7xl7P481vzOyukUOROq593qavlrooz53GfKek3IFply\\_keeUYEp6nyhlsQfRUIXqzJ7Td9R8gU\\_Xw0](https://files.ceqanet.opr.ca.gov/139992-3/attachment/Qtt7xl7P481vzOyukUOROq593qavlrooz53GfKek3IFply_keeUYEp6nyhlsQfRUIXqzJ7Td9R8gU_Xw0), p. 36-37, Table ES-3.



- Renewable Electricity:
  - Power project-related buildings with 100 percent renewable electricity.
- Clean Vehicle Parking:
  - Designate 10 percent of new parking stalls for a combination of low-emitting, fuel-efficient, and carpool/vanpool vehicle.
- Electric Vehicle Chargers:
  - Install electric vehicle charging ports at three percent of new parking stalls and another three percent would be “EVSE-ready.”
- Ground Transportation Clean Vehicle Program:
  - Implement a Commercial Ground Transportation Clean Vehicle Program.
- Bicycle Facilities:
  - Install shower stalls and lockers, as well as covered bicycle storage for employees.
- Employee Parking Cash-Out Program:
  - Implement a parking cash-out program for employees.

Second, feasible mitigation measures can be found in the February 2021 Nevada County Planning Commission Staff Report for the amendment to expand the existing Truckee Tahoe Airport District Administration Building and off-street parking area.<sup>11</sup> Therefore, to reduce the Project’s emissions, consideration of the following measures should be made:

- Diesel engines, whether for off-road or on-road equipment, shall not be left idling for more than two minutes, at any location, except as provided in exceptions to the applicable state regulations regarding idling for off-road and on-road equipment (e.g., traffic conditions, safe operating conditions).
- Instruct construction workers and equipment operators on the maintenance and tuning of construction equipment and require that such workers and operators properly maintain and tune equipment in accordance with manufacturer specifications.
- Before starting onsite ground disturbance, demolition, or construction activities, submit a Construction Emissions Minimization Plan for review and approval. The plan shall include estimates of the construction timeline, with a description of each piece of off-road equipment required. The description may include, but is not limited to, equipment type, equipment manufacturer, engine model year, engine certification (Tier rating), horsepower, and expected fuel usage and hours of operation. For off-road equipment using alternative fuels, the description shall also specify the type of alternative fuel being used. Make the Construction Emissions Minimization Plan available to the public for review onsite during working hours. Post at the construction site a legible and visible sign summarizing the plan. State that the public may ask to inspect the plan for the project at any time during working hours and shall explain how to request to inspect the plan. Post at least one copy of the sign in a visible location on each side of the construction site facing a public right-of-way.

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<sup>11</sup> “NEVADA COUNTY PLANNING COMMISSION STAFF REPORT.” County of Nevada, February 2021, *available at*: <https://www.mynevadacounty.com/DocumentCenter/View/37474/Truckee-Tahoe-Airport-Staff-Report-PLN20-0130--AAP20-0006-EIS20-0008PDE>, p. 28-29.

- Develop and implement a phased carbon management program that is consistent with the standards of ACI “Level 3+” Airport Carbon Accreditation Program, or equivalent, including calculation of annual carbon emissions from airport activity, identifying emissions reduction targets, tracking progress toward achieving effective carbon management procedures, and publishing an annual biennial carbon footprint report as a component of the Airport’s broader environmental sustainability program.

Finally, feasible mitigation measures can be found in CAPCOA’s *Quantifying Greenhouse Gas Mitigation Measures*.<sup>12</sup> Therefore, to reduce the Project’s emissions, consideration of the following measures should be made:

| <b>CAPCOA’s Quantifying Greenhouse Gas Mitigation Measures</b>   |  |
|--|--|
| <b>Measures – Energy</b>   |  |
| <b><i>Building Energy Use</i></b>  |  |
| Obtain Third-party HVAC Commissioning and Verification of Energy Savings   |  |
| <b><i>Lighting</i></b>   |  |
| Install Higher Efficacy Public Street and Area Lighting  |  |
| Limit Outdoor Lighting Requirements  |  |
| <b><i>Alternative Energy Generation</i></b>  |  |
| Establish Onsite Renewable or Carbon-Neutral Energy Systems  |  |
| Establish Onsite Renewable Energy System – Solar Power   |  |
| Utilize a Combined Heat and Power System   |  |
| <b>Measures – Transportation</b>   |  |
| <b><i>Land Use/Location</i></b>  |  |
| Increase Destination Accessibility   |  |
| Increase Transit Accessibility   |  |
| Orient Project Toward Non-Auto Corridor  |  |
| Locate Project near Bike Path/Bike Lane  |  |
| <b><i>Neighborhood/Site Enhancements</i></b>   |  |
| Provide Pedestrian Network Improvements, such as: <ul style="list-style-type: none"> <li>• Compact, mixed-use communities</li> <li>• Interconnected street network</li> <li>• Narrower roadways and shorter block lengths</li> <li>• Sidewalks</li> <li>• Accessibility to transit and transit shelters</li> <li>• Traffic calming measures and street trees</li> <li>• Parks and public spaces</li> <li>• Minimize pedestrian barriers</li> </ul> |  |

<sup>12</sup> <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>

|  |
|--|
| <p>Provide Traffic Calming Measures, such as:</p> <ul style="list-style-type: none"> <li>• Marked crosswalks</li> <li>• Count-down signal timers</li> <li>• Curb extensions</li> <li>• Speed tables</li> <li>• Raised crosswalks</li> <li>• Raised intersections</li> <li>• Median islands</li> <li>• Tight corner radii</li> <li>• Roundabouts or mini-circles</li> <li>• On-street parking</li> <li>• Planter strips with trees</li> <li>• Chicanes/chokers</li> </ul>   |
| <p>Incorporate Bike Lane Street Design (on-site)</p>   |
| <p>Provide Bike Parking in Non-Residential Projects</p>  |
| <p>Provide Electric Vehicle Parking</p>  |
| <p><b><i>Commute Trip Reduction Programs</i></b></p>   |
| <p>Implement Commute Trip Reduction (CTR) Program – Voluntary</p> <ul style="list-style-type: none"> <li>• Carpooling encouragement</li> <li>• Ride-matching assistance</li> <li>• Preferential carpool parking</li> <li>• Flexible work schedules for carpools</li> <li>• Half time transportation coordinator</li> <li>• Vanpool assistance</li> <li>• Bicycle end-trip facilities (parking, showers and lockers)</li> <li>• New employee orientation of trip reduction and alternative mode options</li> <li>• Event promotions and publications</li> <li>• Flexible work schedule for employees</li> <li>• Transit subsidies</li> <li>• Parking cash-out or priced parking</li> <li>• Shuttles</li> <li>• Emergency ride home</li> </ul> |
| <p>Implement Commute Trip Reduction (CTR) Program – Required Implementation/Monitoring</p> <ul style="list-style-type: none"> <li>• Established performance standards (e.g. trip reduction requirements)</li> <li>• Required implementation</li> <li>• Regular monitoring and reporting</li> </ul>   |
| <p>Implement Subsidized or Discounted Transit Program</p>  |
| <p>Provide Ent of Trip Facilities, including:</p> <ul style="list-style-type: none"> <li>• Showers</li> <li>• Secure bicycle lockers</li> <li>• Changing spaces</li> </ul>   |
| <p>Implement Commute Trip Reduction Marketing, such as:</p> <ul style="list-style-type: none"> <li>• New employee orientation of trip reduction and alternative mode options</li> <li>• Event promotions</li> </ul>  |

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| <ul style="list-style-type: none"> <li>• Publications</li> </ul>   |
| Implement Preferential Parking Permit Program  |
| Price Workplace Parking, such as: <ul style="list-style-type: none"> <li>• Explicitly charging for parking for its employees;</li> <li>• Implementing above market rate pricing;</li> <li>• Validating parking only for invited guests;</li> <li>• Not providing employee parking and transportation allowances; and</li> <li>• Educating employees about available alternatives.</li> </ul>   |
| Implement Employee Parking “Cash-Out”  |
| <b><i>Transit System Improvements</i></b>  |
| Transit System Improvements, including: <ul style="list-style-type: none"> <li>• Grade-separated right-of-way, including bus only lanes (for buses, emergency vehicles, and sometimes taxis), and other Transit Priority measures. Some systems use guideways which automatically steer the bus on portions of the route.</li> <li>• Frequent, high-capacity service</li> <li>• High-quality vehicles that are easy to board, quiet, clean, and comfortable to ride.</li> <li>• Pre-paid fare collection to minimize boarding delays.</li> <li>• Integrated fare systems, allowing free or discounted transfers between routes and modes.</li> <li>• Convenient user information and marketing programs.</li> <li>• High quality bus stations with Transit Oriented Development in nearby areas.</li> <li>• Modal integration, with BRT service coordinated with walking and cycling facilities, taxi services, intercity bus, rail transit, and other transportation services.</li> </ul> |
| Implement Transit Access Improvements, such as: <ul style="list-style-type: none"> <li>• Sidewalk/crosswalk safety enhancements</li> <li>• Bus shelter improvements</li> </ul>   |
| Expand Transit Network   |
| Increase Transit Service Frequency/Speed   |
| Provide Bike Parking Near Transit  |
| Provide Local Shuttles   |
| <b><i>Road Pricing/Management</i></b>  |
| Implement Area or Cordon Pricing   |
| Improve Traffic Flow, such as: <ul style="list-style-type: none"> <li>• Signalization improvements to reduce delay;</li> <li>• Incident management to increase response time to breakdowns and collisions;</li> <li>• Intelligent Transportation Systems (ITS) to provide real-time information regarding road conditions and directions; and</li> <li>• Speed management to reduce high free-flow speeds.</li> </ul>  |
| Required Project Contributions to Transportation Infrastructure Improvement Projects   |
| <b><i>Vehicles</i></b>   |
| Utilize Alternative Fueled Vehicles, such as: <ul style="list-style-type: none"> <li>• Biodiesel (B20)</li> </ul>  |

|   |
|---|
| <ul style="list-style-type: none"> <li>• Liquefied Natural Gas (LNG)</li> <li>• Compressed Natural Gas (CNG)</li> </ul>   |
| <b>Measures – Water</b>   |
| <b><i>Water Supply</i></b>  |
| Use Gray Water  |
| Use Locally Sourced Water Supply  |
| <b><i>Water Use</i></b>   |
| Adopt a Water Conservation strategy   |
| Design Water-Efficient Landscapes (see California Department of Water Resources Model Water Efficient Landscape Ordinance), such as: <ul style="list-style-type: none"> <li>• Planting vegetation with minimal water needs, such as native species;</li> <li>• Choosing vegetation appropriate for the climate of the project site;</li> <li>• Choosing complimentary plants with similar water needs or which can provide each other with shade and/or water.</li> </ul> |
| Plant Native Trees and Vegetation   |
| <b>Measures – Vegetation</b>  |
| <b><i>Vegetation</i></b>  |
| Urban Tree Planting   |
| Create New Vegetated Open Space   |
| <b>Measures – Construction</b>  |
| <b><i>Construction</i></b>  |
| Use Alternative Fuels for Construction Equipment  |
| Urban Tree Planting   |
| Use Electric and Hybrid Construction Equipment  |
| Limit Construction Equipment Idling Beyond Regulation Requirements  |
| Institute a Heavy-Duty Off-Road Vehicle Plan, including: <ul style="list-style-type: none"> <li>• Construction vehicle inventory tracking system;</li> <li>• Requiring hour meters on equipment;</li> <li>• Document the serial number, horsepower, manufacture age, fuel, etc. of all onsite equipment; and</li> <li>• Daily logging of the operating hours of the equipment.</li> </ul>   |
| Implement a Construction Vehicle Inventory Tracking System  |
| <b>Measures – Miscellaneous</b>   |
| <b><i>Miscellaneous</i></b>   |
| Establish a Carbon Sequestration Project, such as: <ul style="list-style-type: none"> <li>• Geologic sequestration or carbon capture and storage techniques, in which CO<sub>2</sub> from point sources is captured and injected underground;</li> <li>• Terrestrial sequestration in which ecosystems are established or preserved to serve as CO<sub>2</sub> sinks;</li> <li>• Novel techniques involving advanced chemical or biological pathways; or</li> </ul>       |

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| <ul style="list-style-type: none"> <li>Technologies yet to be discovered.</li> </ul>   |
| Establish Off-Site Mitigation  |
| Use Local and Sustainable Building Materials   |
| <p>Require Environmentally Responsible Purchasing, such as:</p> <ul style="list-style-type: none"> <li>Purchasing products with sustainable packaging;</li> <li>Purchasing post-consumer recycled copier paper, paper towels, and stationary;</li> <li>Purchasing and stocking communal kitchens with reusable dishes and utensils;</li> <li>Choosing sustainable cleaning supplies;</li> <li>Leasing equipment from manufacturers who will recycle the components at their end of life;</li> <li>Choosing ENERGY STAR appliances and Water Sense-certified water fixtures;</li> <li>Choosing electronic appliances with built in sleep-mode timers;</li> <li>Purchasing 'green power' (e.g. electricity generated from renewable or hydropower) from the utility; and</li> <li>Choosing locally-made and distributed products.</li> </ul> |

These measures offer a cost-effective, feasible way to incorporate lower-emitting design features into the proposed Project, which subsequently, reduce emissions released during Project construction and operation. An updated EIR should be prepared to include all feasible mitigation measures, as well as include an updated GHG analysis to ensure that the necessary mitigation measures are implemented to reduce emissions to below thresholds. The updated EIR should also demonstrate a commitment to the implementation of these measures prior to Project approval, to ensure that the Project's significant emissions are reduced to the maximum extent possible.

### Disclaimer

SWAPE has received limited discovery regarding this project. Additional information may become available in the future; thus, we retain the right to revise or amend this report when additional information becomes available. Our professional services have been performed using that degree of care and skill ordinarily exercised, under similar circumstances, by reputable environmental consultants practicing in this or similar localities at the time of service. No other warranty, expressed or implied, is made as to the scope of work, work methodologies and protocols, site conditions, analytical testing results, and findings presented. This report reflects efforts which were limited to information that was reasonably accessible at the time of the work, and may contain informational gaps, inconsistencies, or otherwise be incomplete due to the unavailability or uncertainty of information obtained or provided by third parties.

Sincerely,



Matt Hagemann, P.G., C.Hg.

A handwritten signature in blue ink that reads "Paul Rosenfeld". The signature is written in a cursive style with a large initial 'P'.

Paul E. Rosenfeld, Ph.D.

Attachment A: Paul Rosenfeld CV  
Attachment B: Matt Hagemann CV

| Daily VMT Per Capita from Passenger & Light-Duty Trucks,<br>Exceedances under RTP/SCS Performance-Based SB 375 Target |            |
|---|------------|
| DEIR Modeling   |            |
| Daily VMT Per Capita  | 20.40      |
| 2020 RTP/SCS Benchmark, Los Angeles County  |            |
| 19.2 VMT (2045 Target) Exceed?  | <b>Yes</b> |



| <b>2017 Scoping Plan Daily VMT Per Capita</b> |                   |                         |                       |
|---|-------------------|-------------------------|-----------------------|
| <b>Los Angeles County</b>                     |                   |                         |                       |
| <b>Year</b>                                   | <b>Population</b> | <b>LDV VMT Baseline</b> | <b>VMT Per Capita</b> |
| <b>2030</b>                                   | 10,868,614        | 215,539,586             | 19.83                 |

| <b>Daily VMT Per Capita from Passenger &amp; Light-Duty Trucks,<br/>Exceedances under 2017 Scoping Plan Performance-Based SB 375 Benchmarks</b> |                      |
|---|----------------------|
| <b>Sources</b>  | <b>DEIR Modeling</b> |
| Daily VMT Per Capita  | 20.40                |
| <b>2017 Scoping Plan Benchmarks, Los Angeles County Specific</b>  |                      |
| 19.83 VMT (2030 Projected) Exceed?  | <b>Yes</b>           |



Technical Consultation, Data Analysis and  
Litigation Support for the Environment

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## ***Paul Rosenfeld, Ph.D.***

*Principal Environmental Chemist*

**Chemical Fate and Transport & Air Dispersion Modeling**

**Risk Assessment & Remediation Specialist**

### **Education**

Ph.D. Soil Chemistry, University of Washington, 1999. Dissertation on volatile organic compound filtration.

M.S. Environmental Science, U.C. Berkeley, 1995. Thesis on organic waste economics.

B.A. Environmental Studies, U.C. Santa Barbara, 1991. Thesis on wastewater treatment.

### **Professional Experience**

Dr. Rosenfeld has over 25 years' experience conducting environmental investigations and risk assessments for evaluating impacts to human health, property, and ecological receptors. His expertise focuses on the fate and transport of environmental contaminants, human health risk, exposure assessment, and ecological restoration. Dr. Rosenfeld has evaluated and modeled emissions from unconventional oil drilling operations, oil spills, landfills, boilers and incinerators, process stacks, storage tanks, confined animal feeding operations, and many other industrial and agricultural sources. His project experience ranges from monitoring and modeling of pollution sources to evaluating impacts of pollution on workers at industrial facilities and residents in surrounding communities.

Dr. Rosenfeld has investigated and designed remediation programs and risk assessments for contaminated sites containing lead, heavy metals, mold, bacteria, particulate matter, petroleum hydrocarbons, chlorinated solvents, pesticides, radioactive waste, dioxins and furans, semi- and volatile organic compounds, PCBs, PAHs, perchlorate, asbestos, per- and poly-fluoroalkyl substances (PFOA/PFOS), unusual polymers, fuel oxygenates (MTBE), among other pollutants. Dr. Rosenfeld also has experience evaluating greenhouse gas emissions from various projects and is an expert on the assessment of odors from industrial and agricultural sites, as well as the evaluation of odor nuisance impacts and technologies for abatement of odorous emissions. As a principal scientist at SWAPE, Dr. Rosenfeld directs air dispersion modeling and exposure assessments. He has served as an expert witness and testified about pollution sources causing nuisance and/or personal injury at dozens of sites and has testified as an expert witness on more than ten cases involving exposure to air contaminants from industrial sources.

## Professional History:

Soil Water Air Protection Enterprise (SWAPE); 2003 to present; Principal and Founding Partner  
 UCLA School of Public Health; 2007 to 2011; Lecturer (Assistant Researcher)  
 UCLA School of Public Health; 2003 to 2006; Adjunct Professor  
 UCLA Environmental Science and Engineering Program; 2002-2004; Doctoral Intern Coordinator  
 UCLA Institute of the Environment, 2001-2002; Research Associate  
 Komex H<sub>2</sub>O Science, 2001 to 2003; Senior Remediation Scientist  
 National Groundwater Association, 2002-2004; Lecturer  
 San Diego State University, 1999-2001; Adjunct Professor  
 Anteon Corp., San Diego, 2000-2001; Remediation Project Manager  
 Ogden (now Amec), San Diego, 2000-2000; Remediation Project Manager  
 Bechtel, San Diego, California, 1999 – 2000; Risk Assessor  
 King County, Seattle, 1996 – 1999; Scientist  
 James River Corp., Washington, 1995-96; Scientist  
 Big Creek Lumber, Davenport, California, 1995; Scientist  
 Plumas Corp., California and USFS, Tahoe 1993-1995; Scientist  
 Peace Corps and World Wildlife Fund, St. Kitts, West Indies, 1991-1993; Scientist

## Publications:

Remy, L.L., Clay T., Byers, V., **Rosenfeld P. E.** (2019) Hospital, Health, and Community Burden After Oil Refinery Fires, Richmond, California 2007 and 2012. *Environmental Health*. 18:48

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Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (August 21 – 25, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *The 26th International Symposium on Halogenated Persistent Organic Pollutants – DIOXIN2006*. Lecture conducted from Radisson SAS Scandinavia Hotel in Oslo Norway.

Hensley A.R., Scott, A., **Rosenfeld P.E.**, Clark, J.J.J. (November 4-8, 2006). Dioxin Containing Attic Dust And Human Blood Samples Collected Near A Former Wood Treatment Facility. *APHA 134 Annual Meeting & Exposition*. Lecture conducted from Boston Massachusetts.

**Paul Rosenfeld Ph.D.** (October 24-25, 2005). Fate, Transport and Persistence of PFOA and Related Chemicals. Mealey's C8/PFOA. *Science, Risk & Litigation Conference*. Lecture conducted from The Rittenhouse Hotel, Philadelphia, PA.

**Paul Rosenfeld Ph.D.** (September 19, 2005). Brominated Flame Retardants in Groundwater: Pathways to Human Ingestion, *Toxicology and Remediation PEMA Emerging Contaminant Conference*. Lecture conducted from Hilton Hotel, Irvine California.

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**Paul Rosenfeld Ph.D.** (September 26-27, 2005). Fate, Transport and Persistence of PDBEs. *Mealey's Groundwater Conference*. Lecture conducted from Ritz Carlton Hotel, Marina Del Ray, California.

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**Paul Rosenfeld Ph.D.** (July 21-22, 2005). Fate Transport, Persistence and Toxicology of PFOA and Related Perfluorochemicals. *2005 National Groundwater Association Ground Water And Environmental Law Conference*. Lecture conducted from Wyndham Baltimore Inner Harbor, Baltimore Maryland.

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**Rosenfeld, P. E.,** Grey, M., (June 2003) Two stage biofilter for biosolids composting odor control. *Seventh International In Situ And On Site Bioremediation Symposium Battelle Conference* Orlando, FL.

**Paul Rosenfeld, Ph.D.** and James Clark Ph.D. (February 20-21, 2003) Understanding Historical Use, Chemical Properties, Toxicity and Regulatory Guidance of 1,4 Dioxane. *National Groundwater Association. Southwest Focus Conference. Water Supply and Emerging Contaminants..* Lecture conducted from Hyatt Regency Phoenix Arizona.

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**Rosenfeld, P.E.** and Suffet, M. (October 7- 10, 2002). Using High Carbon Wood Ash to Control Compost Odor. *Sixth Annual Symposium On Off Flavors in the Aquatic Environment. International Water Association*. Lecture conducted from Barcelona Spain.

**Rosenfeld, P.E.** and Grey, M. A. (September 22-24, 2002). Biocycle Composting For Coastal Sage Restoration. *Northwest Biosolids Management Association*. Lecture conducted from Vancouver Washington..

**Rosenfeld, P.E.** and Grey, M. A. (November 11-14, 2002). Using High-Carbon Wood Ash to Control Odor at a Green Materials Composting Facility. *Soil Science Society Annual Conference*. Lecture conducted from Indianapolis, Maryland.

**Rosenfeld, P.E.** (September 16, 2000). Two stage biofilter for biosolids composting odor control. *Water Environment Federation*. Lecture conducted from Anaheim California.

**Rosenfeld, P.E.** (October 16, 2000). Wood ash and biofilter control of compost odor. *Biofest*. Lecture conducted from Ocean Shores, California.

**Rosenfeld, P.E.** (2000). Bioremediation Using Organic Soil Amendments. *California Resource Recovery Association*. Lecture conducted from Sacramento California.

**Rosenfeld, P.E.,** C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. *Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings*. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.,** and C.L. Henry. (1999). An evaluation of ash incorporation with biosolids for odor reduction. *Soil Science Society of America*. Lecture conducted from Salt Lake City Utah.

**Rosenfeld, P.E.,** C.L. Henry, R. Harrison. (1998). Comparison of Microbial Activity and Odor Emissions from Three Different Biosolids Applied to Forest Soil. *Brown and Caldwell*. Lecture conducted from Seattle Washington.

**Rosenfeld, P.E.,** C.L. Henry. (1998). Characterization, Quantification, and Control of Odor Emissions from Biosolids Application To Forest Soil. *Biofest*. Lecture conducted from Lake Chelan, Washington.



**Rosenfeld, P.E.,** C.L. Henry, R. Harrison. (1998). Oat and Grass Seed Germination and Nitrogen and Sulfur Emissions Following Biosolids Incorporation With High-Carbon Wood-Ash. Water Environment Federation 12th Annual Residuals and Biosolids Management Conference Proceedings. Lecture conducted from Bellevue Washington.

**Rosenfeld, P.E.,** C.L. Henry, R. B. Harrison, and R. Dills. (1997). Comparison of Odor Emissions From Three Different Biosolids Applied to Forest Soil. *Soil Science Society of America*. Lecture conducted from Anaheim California.

### **Teaching Experience:**

UCLA Department of Environmental Health (Summer 2003 through 20010) Taught Environmental Health Science 100 to students, including undergrad, medical doctors, public health professionals and nurses. Course focused on the health effects of environmental contaminants.

National Ground Water Association, Successful Remediation Technologies. Custom Course in Sante Fe, New Mexico. May 21, 2002. Focused on fate and transport of fuel contaminants associated with underground storage tanks.

National Ground Water Association; Successful Remediation Technologies Course in Chicago Illinois. April 1, 2002. Focused on fate and transport of contaminants associated with Superfund and RCRA sites.

California Integrated Waste Management Board, April and May, 2001. Alternative Landfill Caps Seminar in San Diego, Ventura, and San Francisco. Focused on both prescriptive and innovative landfill cover design.

UCLA Department of Environmental Engineering, February 5, 2002. Seminar on Successful Remediation Technologies focusing on Groundwater Remediation.

University Of Washington, Soil Science Program, Teaching Assistant for several courses including: Soil Chemistry, Organic Soil Amendments, and Soil Stability.

U.C. Berkeley, Environmental Science Program Teaching Assistant for Environmental Science 10.

### **Academic Grants Awarded:**

California Integrated Waste Management Board. \$41,000 grant awarded to UCLA Institute of the Environment. Goal: To investigate effect of high carbon wood ash on volatile organic emissions from compost. 2001.

Synagro Technologies, Corona California: \$10,000 grant awarded to San Diego State University. Goal: investigate effect of biosolids for restoration and remediation of degraded coastal sage soils. 2000.

King County, Department of Research and Technology, Washington State. \$100,000 grant awarded to University of Washington: Goal: To investigate odor emissions from biosolids application and the effect of polymers and ash on VOC emissions. 1998.

Northwest Biosolids Management Association, Washington State. \$20,000 grant awarded to investigate effect of polymers and ash on VOC emissions from biosolids. 1997.

James River Corporation, Oregon: \$10,000 grant was awarded to investigate the success of genetically engineered Poplar trees with resistance to round-up. 1996.

United State Forest Service, Tahoe National Forest: \$15,000 grant was awarded to investigating fire ecology of the Tahoe National Forest. 1995.

Kellogg Foundation, Washington D.C. \$500 grant was awarded to construct a large anaerobic digester on St. Kitts in West Indies. 1993

## **Deposition and/or Trial Testimony:**

- In the United States District Court For The Southern District of Illinois  
 Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.  
 Case No.: 3:19-cv-00302-SMY-GCS  
 Rosenfeld Deposition. 2-19-2020
- In the Circuit Court of Jackson County, Missouri  
 Karen Cornwell, *Plaintiff*, vs. Marathon Petroleum, LP, *Defendant*.  
 Case No.: 1716-CV10006  
 Rosenfeld Deposition. 8-30-2019
- In the United States District Court For The District of New Jersey  
 Duarte et al, *Plaintiffs*, vs. United States Metals Refining Company et. al. *Defendant*.  
 Case No.: 2:17-cv-01624-ES-SCM  
 Rosenfeld Deposition. 6-7-2019
- In the United States District Court of Southern District of Texas Galveston Division  
 M/T Carla Maersk, *Plaintiffs*, vs. Conti 168., Schiffahrts-GMBH & Co. Bulker KG MS “Conti Perdido”  
*Defendant*.  
 Case No.: 3:15-CV-00106 consolidated with 3:15-CV-00237  
 Rosenfeld Deposition. 5-9-2019
- In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica  
 Carole-Taddeo-Bates et al., vs. Ifran Khan et al., Defendants  
 Case No.: No. BC615636  
 Rosenfeld Deposition, 1-26-2019
- In The Superior Court of the State of California In And For The County Of Los Angeles – Santa Monica  
 The San Gabriel Valley Council of Governments et al. vs El Adobe Apts. Inc. et al., Defendants  
 Case No.: No. BC646857  
 Rosenfeld Deposition, 10-6-2018; Trial 3-7-19
- In United States District Court For The District of Colorado  
 Bells et al. Plaintiff vs. The 3M Company et al., Defendants  
 Case: No 1:16-cv-02531-RBJ  
 Rosenfeld Deposition, 3-15-2018 and 4-3-2018
- In The District Court Of Regan County, Texas, 112<sup>th</sup> Judicial District  
 Phillip Bales et al., Plaintiff vs. Dow Agrosiences, LLC, et al., Defendants  
 Cause No 1923  
 Rosenfeld Deposition, 11-17-2017
- In The Superior Court of the State of California In And For The County Of Contra Costa  
 Simons et al., Plaintiffs vs. Chevron Corporation, et al., Defendants  
 Cause No C12-01481  
 Rosenfeld Deposition, 11-20-2017
- In The Circuit Court Of The Twentieth Judicial Circuit, St Clair County, Illinois  
 Martha Custer et al., Plaintiff vs. Cerro Flow Products, Inc., Defendants  
 Case No.: No. 0i9-L-2295  
 Rosenfeld Deposition, 8-23-2017

- In United States District Court For The Southern District of Mississippi  
Guy Manuel vs. The BP Exploration et al., Defendants  
Case: No 1:19-cv-00315-RHW  
Rosenfeld Deposition, 4-22-2020
- In The Superior Court of the State of California, For The County of Los Angeles  
Warrn Gilbert and Penny Gilber, Plaintiff vs. BMW of North America LLC  
Case No.: LC102019 (c/w BC582154)  
Rosenfeld Deposition, 8-16-2017, Trail 8-28-2018
- In the Northern District Court of Mississippi, Greenville Division  
Brenda J. Cooper, et al., *Plaintiffs*, vs. Meritor Inc., et al., *Defendants*  
Case Number: 4:16-cv-52-DMB-JVM  
Rosenfeld Deposition: July 2017
- In The Superior Court of the State of Washington, County of Snohomish  
Michael Davis and Julie Davis et al., Plaintiff vs. Cedar Grove Composting Inc., Defendants  
Case No.: No. 13-2-03987-5  
Rosenfeld Deposition, February 2017  
Trial, March 2017
- In The Superior Court of the State of California, County of Alameda  
Charles Spain., Plaintiff vs. Thermo Fisher Scientific, et al., Defendants  
Case No.: RG14711115  
Rosenfeld Deposition, September 2015
- In The Iowa District Court In And For Poweshiek County  
Russell D. Winburn, et al., Plaintiffs vs. Doug Hoksbergen, et al., Defendants  
Case No.: LALA002187  
Rosenfeld Deposition, August 2015
- In The Iowa District Court For Wapello County  
Jerry Dovico, et al., Plaintiffs vs. Valley View Sine LLC, et al., Defendants  
Law No.: LALA105144 - Division A  
Rosenfeld Deposition, August 2015
- In The Iowa District Court For Wapello County  
Doug Pauls, et al., et al., Plaintiffs vs. Richard Warren, et al., Defendants  
Law No.: LALA105144 - Division A  
Rosenfeld Deposition, August 2015
- In The Circuit Court of Ohio County, West Virginia  
Robert Andrews, et al. v. Antero, et al.  
Civil Action N0. 14-C-30000  
Rosenfeld Deposition, June 2015
- In The Third Judicial District County of Dona Ana, New Mexico  
Betty Gonzalez, et al. Plaintiffs vs. Del Oro Dairy, Del Oro Real Estate LLC, Jerry Settles and Deward  
DeRuyter, Defendants  
Rosenfeld Deposition: July 2015
- In The Iowa District Court For Muscatine County  
Laurie Freeman et. al. Plaintiffs vs. Grain Processing Corporation, Defendant  
Case No 4980  
Rosenfeld Deposition: May 2015



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Matt Hagemann, P.G., C.Hg.  
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[mhagemann@swape.com](mailto:mhagemann@swape.com)

## **Matthew F. Hagemann, P.G., C.Hg., QSD, QSP**

**Geologic and Hydrogeologic Characterization  
Investigation and Remediation Strategies  
Litigation Support and Testifying Expert  
Industrial Stormwater Compliance  
CEQA Review**

### **Education:**

M.S. Degree, Geology, California State University Los Angeles, Los Angeles, CA, 1984.

B.A. Degree, Geology, Humboldt State University, Arcata, CA, 1982.

### **Professional Certifications:**

California Professional Geologist

California Certified Hydrogeologist

Qualified SWPPP Developer and Practitioner

### **Professional Experience:**

Matt has 30 years of experience in environmental policy, contaminant assessment and remediation, stormwater compliance, and CEQA review. He spent nine years with the U.S. EPA in the RCRA and Superfund programs and served as EPA's Senior Science Policy Advisor in the Western Regional Office where he identified emerging threats to groundwater from perchlorate and MTBE. While with EPA, Matt also served as a Senior Hydrogeologist in the oversight of the assessment of seven major military facilities undergoing base closure. He led numerous enforcement actions under provisions of the Resource Conservation and Recovery Act (RCRA) and directed efforts to improve hydrogeologic characterization and water quality monitoring. For the past 15 years, as a founding partner with SWAPE, Matt has developed extensive client relationships and has managed complex projects that include consultation as an expert witness and a regulatory specialist, and a manager of projects ranging from industrial stormwater compliance to CEQA review of impacts from hazardous waste, air quality and greenhouse gas emissions.

Positions Matt has held include:

- Founding Partner, Soil/Water/Air Protection Enterprise (SWAPE) (2003 – present);
- Geology Instructor, Golden West College, 2010 – 2014, 2017;
- Senior Environmental Analyst, Komex H2O Science, Inc. (2000 -- 2003);

- Executive Director, Orange Coast Watch (2001 – 2004);
- Senior Science Policy Advisor and Hydrogeologist, U.S. Environmental Protection Agency (1989–1998);
- Hydrogeologist, National Park Service, Water Resources Division (1998 – 2000);
- Adjunct Faculty Member, San Francisco State University, Department of Geosciences (1993 – 1998);
- Instructor, College of Marin, Department of Science (1990 – 1995);
- Geologist, U.S. Forest Service (1986 – 1998); and
- Geologist, Dames & Moore (1984 – 1986).

**Senior Regulatory and Litigation Support Analyst:**

With SWAPE, Matt’s responsibilities have included:

- Lead analyst and testifying expert in the review of over 300 environmental impact reports and negative declarations since 2003 under CEQA that identify significant issues with regard to hazardous waste, water resources, water quality, air quality, greenhouse gas emissions, and geologic hazards. Make recommendations for additional mitigation measures to lead agencies at the local and county level to include additional characterization of health risks and implementation of protective measures to reduce worker exposure to hazards from toxins and Valley Fever.
- Stormwater analysis, sampling and best management practice evaluation at more than 150 industrial facilities.
- Expert witness on numerous cases including, for example, perfluorooctanoic acid (PFOA) contamination of groundwater, MTBE litigation, air toxins at hazards at a school, CERCLA compliance in assessment and remediation, and industrial stormwater contamination.
- Technical assistance and litigation support for vapor intrusion concerns.
- Lead analyst and testifying expert in the review of environmental issues in license applications for large solar power plants before the California Energy Commission.
- Manager of a project to evaluate numerous formerly used military sites in the western U.S.
- Manager of a comprehensive evaluation of potential sources of perchlorate contamination in Southern California drinking water wells.
- Manager and designated expert for litigation support under provisions of Proposition 65 in the review of releases of gasoline to sources drinking water at major refineries and hundreds of gas stations throughout California.

With Komex H2O Science Inc., Matt’s duties included the following:

- Senior author of a report on the extent of perchlorate contamination that was used in testimony by the former U.S. EPA Administrator and General Counsel.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of MTBE use, research, and regulation.
- Senior researcher in the development of a comprehensive, electronically interactive chronology of perchlorate use, research, and regulation.
- Senior researcher in a study that estimates nationwide costs for MTBE remediation and drinking water treatment, results of which were published in newspapers nationwide and in testimony against provisions of an energy bill that would limit liability for oil companies.
- Research to support litigation to restore drinking water supplies that have been contaminated by MTBE in California and New York.

- Expert witness testimony in a case of oil production-related contamination in Mississippi.
- Lead author for a multi-volume remedial investigation report for an operating school in Los Angeles that met strict regulatory requirements and rigorous deadlines.
- Development of strategic approaches for cleanup of contaminated sites in consultation with clients and regulators.

#### **Executive Director:**

As Executive Director with Orange Coast Watch, Matt led efforts to restore water quality at Orange County beaches from multiple sources of contamination including urban runoff and the discharge of wastewater. In reporting to a Board of Directors that included representatives from leading Orange County universities and businesses, Matt prepared issue papers in the areas of treatment and disinfection of wastewater and control of the discharge of grease to sewer systems. Matt actively participated in the development of countywide water quality permits for the control of urban runoff and permits for the discharge of wastewater. Matt worked with other nonprofits to protect and restore water quality, including Surfrider, Natural Resources Defense Council and Orange County CoastKeeper as well as with business institutions including the Orange County Business Council.

#### **Hydrogeology:**

As a Senior Hydrogeologist with the U.S. Environmental Protection Agency, Matt led investigations to characterize and cleanup closing military bases, including Mare Island Naval Shipyard, Hunters Point Naval Shipyard, Treasure Island Naval Station, Alameda Naval Station, Moffett Field, Mather Army Airfield, and Sacramento Army Depot. Specific activities were as follows:

- Led efforts to model groundwater flow and contaminant transport, ensured adequacy of monitoring networks, and assessed cleanup alternatives for contaminated sediment, soil, and groundwater.
- Initiated a regional program for evaluation of groundwater sampling practices and laboratory analysis at military bases.
- Identified emerging issues, wrote technical guidance, and assisted in policy and regulation development through work on four national U.S. EPA workgroups, including the Superfund Groundwater Technical Forum and the Federal Facilities Forum.

At the request of the State of Hawaii, Matt developed a methodology to determine the vulnerability of groundwater to contamination on the islands of Maui and Oahu. He used analytical models and a GIS to show zones of vulnerability, and the results were adopted and published by the State of Hawaii and County of Maui.

As a hydrogeologist with the EPA Groundwater Protection Section, Matt worked with provisions of the Safe Drinking Water Act and NEPA to prevent drinking water contamination. Specific activities included the following:

- Received an EPA Bronze Medal for his contribution to the development of national guidance for the protection of drinking water.
- Managed the Sole Source Aquifer Program and protected the drinking water of two communities through designation under the Safe Drinking Water Act. He prepared geologic reports, conducted

public hearings, and responded to public comments from residents who were very concerned about the impact of designation.

- Reviewed a number of Environmental Impact Statements for planned major developments, including large hazardous and solid waste disposal facilities, mine reclamation, and water transfer.

Matt served as a hydrogeologist with the RCRA Hazardous Waste program. Duties were as follows:

- Supervised the hydrogeologic investigation of hazardous waste sites to determine compliance with Subtitle C requirements.
- Reviewed and wrote "part B" permits for the disposal of hazardous waste.
- Conducted RCRA Corrective Action investigations of waste sites and led inspections that formed the basis for significant enforcement actions that were developed in close coordination with U.S. EPA legal counsel.
- Wrote contract specifications and supervised contractor's investigations of waste sites.

With the National Park Service, Matt directed service-wide investigations of contaminant sources to prevent degradation of water quality, including the following tasks:

- Applied pertinent laws and regulations including CERCLA, RCRA, NEPA, NRDA, and the Clean Water Act to control military, mining, and landfill contaminants.
- Conducted watershed-scale investigations of contaminants at parks, including Yellowstone and Olympic National Park.
- Identified high-levels of perchlorate in soil adjacent to a national park in New Mexico and advised park superintendent on appropriate response actions under CERCLA.
- Served as a Park Service representative on the Interagency Perchlorate Steering Committee, a national workgroup.
- Developed a program to conduct environmental compliance audits of all National Parks while serving on a national workgroup.
- Co-authored two papers on the potential for water contamination from the operation of personal watercraft and snowmobiles, these papers serving as the basis for the development of nationwide policy on the use of these vehicles in National Parks.
- Contributed to the Federal Multi-Agency Source Water Agreement under the Clean Water Action Plan.

### **Policy:**

Served senior management as the Senior Science Policy Advisor with the U.S. Environmental Protection Agency, Region 9.

Activities included the following:

- Advised the Regional Administrator and senior management on emerging issues such as the potential for the gasoline additive MTBE and ammonium perchlorate to contaminate drinking water supplies.
- Shaped EPA's national response to these threats by serving on workgroups and by contributing to guidance, including the Office of Research and Development publication, *Oxygenates in Water: Critical Information and Research Needs*.
- Improved the technical training of EPA's scientific and engineering staff.
- Earned an EPA Bronze Medal for representing the region's 300 scientists and engineers in negotiations with the Administrator and senior management to better integrate scientific

principles into the policy-making process.

- Established national protocol for the peer review of scientific documents.

### **Geology:**

With the U.S. Forest Service, Matt led investigations to determine hillslope stability of areas proposed for timber harvest in the central Oregon Coast Range. Specific activities were as follows:

- Mapped geology in the field, and used aerial photographic interpretation and mathematical models to determine slope stability.
- Coordinated his research with community members who were concerned with natural resource protection.
- Characterized the geology of an aquifer that serves as the sole source of drinking water for the city of Medford, Oregon.

As a consultant with Dames and Moore, Matt led geologic investigations of two contaminated sites (later listed on the Superfund NPL) in the Portland, Oregon, area and a large hazardous waste site in eastern Oregon. Duties included the following:

- Supervised year-long effort for soil and groundwater sampling.
- Conducted aquifer tests.
- Investigated active faults beneath sites proposed for hazardous waste disposal.

### **Teaching:**

From 1990 to 1998, Matt taught at least one course per semester at the community college and university levels:

- At San Francisco State University, held an adjunct faculty position and taught courses in environmental geology, oceanography (lab and lecture), hydrogeology, and groundwater contamination.
- Served as a committee member for graduate and undergraduate students.
- Taught courses in environmental geology and oceanography at the College of Marin.

Matt is currently a part time geology instructor at Golden West College in Huntington Beach, California where he taught from 2010 to 2014 and in 2017.

### **Invited Testimony, Reports, Papers and Presentations:**

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Presentation to the Public Environmental Law Conference, Eugene, Oregon.

**Hagemann, M.F.**, 2008. Disclosure of Hazardous Waste Issues under CEQA. Invited presentation to U.S. EPA Region 9, San Francisco, California.

**Hagemann, M.F.**, 2005. Use of Electronic Databases in Environmental Regulation, Policy Making and Public Participation. Brownfields 2005, Denver, Colorado.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Nevada and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Las Vegas, NV (served on conference organizing committee).



**Hagemann, M.F.**, 2004. Invited testimony to a California Senate committee hearing on air toxins at schools in Southern California, Los Angeles.

Brown, A., Farrow, J., Gray, A. and **Hagemann, M.**, 2004. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to the Ground Water and Environmental Law Conference, National Groundwater Association.

**Hagemann, M.F.**, 2004. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in Arizona and the Southwestern U.S. Presentation to a meeting of the American Groundwater Trust, Phoenix, AZ (served on conference organizing committee).

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River and Impacts to Drinking Water in the Southwestern U.S. Invited presentation to a special committee meeting of the National Academy of Sciences, Irvine, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a tribal EPA meeting, Pechanga, CA.

**Hagemann, M.F.**, 2003. Perchlorate Contamination of the Colorado River. Invited presentation to a meeting of tribal representatives, Parker, AZ.

**Hagemann, M.F.**, 2003. Impact of Perchlorate on the Colorado River and Associated Drinking Water Supplies. Invited presentation to the Inter-Tribal Meeting, Torres Martinez Tribe.

**Hagemann, M.F.**, 2003. The Emergence of Perchlorate as a Widespread Drinking Water Contaminant. Invited presentation to the U.S. EPA Region 9.

**Hagemann, M.F.**, 2003. A Deductive Approach to the Assessment of Perchlorate Contamination. Invited presentation to the California Assembly Natural Resources Committee.

**Hagemann, M.F.**, 2003. Perchlorate: A Cold War Legacy in Drinking Water. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. From Tank to Tap: A Chronology of MTBE in Groundwater. Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. A Chronology of MTBE in Groundwater and an Estimate of Costs to Address Impacts to Groundwater. Presentation to the annual meeting of the Society of Environmental Journalists.

**Hagemann, M.F.**, 2002. An Estimate of the Cost to Address MTBE Contamination in Groundwater (and Who Will Pay). Presentation to a meeting of the National Groundwater Association.

**Hagemann, M.F.**, 2002. An Estimate of Costs to Address MTBE Releases from Underground Storage Tanks and the Resulting Impact to Drinking Water Wells. Presentation to a meeting of the U.S. EPA and State Underground Storage Tank Program managers.

**Hagemann, M.F.**, 2001. From Tank to Tap: A Chronology of MTBE in Groundwater. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Cleanup Cost for MTBE in Groundwater Used as Drinking Water. Unpublished report.

**Hagemann, M.F.**, 2001. Estimated Costs to Address MTBE Releases from Leaking Underground Storage Tanks. Unpublished report.

**Hagemann, M.F.**, and VanMouwerik, M., 1999. Potential Water Quality Concerns Related to Snowmobile Usage. Water Resources Division, National Park Service, Technical Report.

VanMouwerik, M. and **Hagemann, M.F.** 1999, Water Quality Concerns Related to Personal Watercraft Usage. Water Resources Division, National Park Service, Technical Report.

**Hagemann, M.F.**, 1999, Is Dilution the Solution to Pollution in National Parks? The George Wright Society Biannual Meeting, Asheville, North Carolina.

**Hagemann, M.F.**, 1997, The Potential for MTBE to Contaminate Groundwater. U.S. EPA Superfund Groundwater Technical Forum Annual Meeting, Las Vegas, Nevada.

**Hagemann, M.F.**, and Gill, M., 1996, Impediments to Intrinsic Remediation, Moffett Field Naval Air Station, Conference on Intrinsic Remediation of Chlorinated Hydrocarbons, Salt Lake City.

**Hagemann, M.F.**, Fukunaga, G.L., 1996, The Vulnerability of Groundwater to Anthropogenic Contaminants on the Island of Maui, Hawaii. Hawaii Water Works Association Annual Meeting, Maui, October 1996.

**Hagemann, M. F.**, Fukunaga, G. L., 1996, Ranking Groundwater Vulnerability in Central Oahu, Hawaii. Proceedings, Geographic Information Systems in Environmental Resources Management, Air and Waste Management Association Publication VIP-61.

**Hagemann, M.F.**, 1994. Groundwater Characterization and Clean up at Closing Military Bases in California. Proceedings, California Groundwater Resources Association Meeting.

**Hagemann, M.F.** and Sabol, M.A., 1993. Role of the U.S. EPA in the High Plains States Groundwater Recharge Demonstration Program. Proceedings, Sixth Biennial Symposium on the Artificial Recharge of Groundwater.

**Hagemann, M.F.**, 1993. U.S. EPA Policy on the Technical Impracticability of the Cleanup of DNAPL-contaminated Groundwater. California Groundwater Resources Association Meeting.

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**Hagemann, M.F.**, 1992. Dense Nonaqueous Phase Liquid Contamination of Groundwater: An Ounce of Prevention... Proceedings, Association of Engineering Geologists Annual Meeting, v. 35.

**Other Experience:**

Selected as subject matter expert for the California Professional Geologist licensing examinations, 2009-2011.

**From:** [FABIAN RAYGOSA via Smartsheet](#)  
**To:** [CRUZ, OHASSY C.](#)  
**Subject:** Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 11:43:37 PM



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

Changes since 3/15/21 11:41 PM

1 row added

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

Row 90

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 90  |
| <b>Full Name</b>     | David Kimball Alexander   |
| <b>Company Name</b>  |   |
| <b>Email Address</b> | davidakimball@zoho.com  |
| <b>Comments</b>      | There needs to be a supplemental EIR using findings from NES. Noise section of EIR still includes the reverse engineered, guaranteed a FONSI noise metric and standard of 65 dB DNL. We need real, unbiased, non-FAA and Airline Industry metrics to honestly assess the environmental and health damages that will result from expanded air traffic from any LAX expansion. There is already way too much air traffic in LA. You should be restricting, not expanding. |
| <b>Created</b>       | 03/15/21 11:41 PM   |
| <b>Project</b>       | ATMP-Draft EIR  |

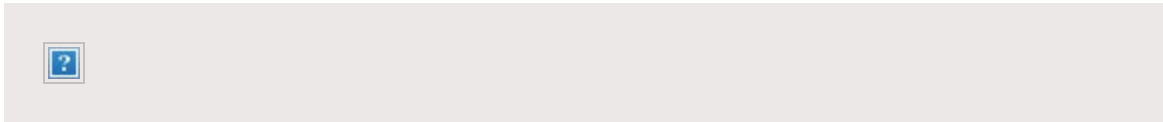
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**From:** [CRUZ, OHASSY C.](#)  
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**Subject:** FW: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 8:31:24 AM

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**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
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**To:** CRUZ, OHASSY C. <OCRUZ@lawa.org>  
**Subject:** Addition to Our LAX Comment Form: Notification



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

Changes since 3/14/21 8:39 PM

- 1 row added
  - 1 attachment added
- 


1 row added or updated (shown in yellow)


Row 77

|                      |  |
|----------------------|--|
| <b>Row ID</b>        | 77   |
| <b>Full Name</b>     | Christina V. Davis   |
| <b>Company Name</b>  | LAX Coastal Chamber of Commerce  |
| <b>Email Address</b> | <a href="mailto:CHRISTINA@LAXCOASTAL.COM">CHRISTINA@LAXCOASTAL.COM</a> |
| <b>Comments</b>      | Please see attached letter.  |
| <b>Created</b>       | 03/14/21 8:39 PM   |
| <b>Project</b>       | ATMP-Draft EIR   |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

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 1 attachment added

 [3.14.21 ATMP DEIR Comment LAXCC.pdf \(186k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on

Row 77: Christina V. Davis

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Los Angeles, CA 90045  
tel 310.645.5151 | info@laxcoastal.com

March 14, 2021

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

Dear Ms. Quintanilla:

The LAX Coastal Area Chamber has completed its review of the Draft Environmental Impact Report (DEIR) for the LAX Airfield and Terminal Modernization Project (ATMP). We find that the ATMP DEIR is in large measure a capable document that thoroughly apprises you of the potential impacts of the projects you are considering as required by CEQA and NEPA.

From a policy perspective, we are in support of the overall plan as set forth in the ATMP. We are pleased to see LAWA prioritize capital improvements for these critical landside projects which will improve traffic and access to the airport. We will submit our more detailed policy recommendation to the Board of Airport Commissioners separately from this document which contains our comments to the DEIR.

With respect to the DEIR, we would like to draw to your attention to the following:

Of particular interest to our membership are the sections of the DEIR addressing vehicular traffic accessing the Central Terminal Area (CTA). In addition to the information contained in the report, our members were able to receive additional briefing on this issue and conclude that the report's assessment of reduced Vehicle Miles Traveled (VMT) as well as the design features contained in the flyover access to the CTA provide a substantial benefit to the flow of traffic impacting our community overall and specifically its impacts the Westchester Business District. These changes appear to address, in a positive manner, the current difficulties found at the intersection of Sepulveda and Lincoln and provide miles of queuing space in the newly created access roads taking those vehicles off the already heavily burdened local arterials.

Additionally, we notice a lack of information regarding any modeling of modes of transport for passengers in this DEIR. More specifically, modeling of the capacity of the Automated People Mover (APM) at peak times under the assumption that the APM will handle all rental car customers as well as parking facilities adjacent to the APM which may include both employees and passengers. Some questions that arise for this include: Will the APM be able to handle the projected volume of riders? Will there be more modeling to include passenger volume from other modes of transportation and will those models include employee and passenger access to the CTA? With private vehicles, Ubers, fly-way buses, parking/airport shuttles also serving as options are their projections for the percentage of people that these modes will service?

We also remain concerned about other impacts on the Westchester Business District that appear less than fully defined in the DEIR including issues relating to employee and traveler parking. Our members have long felt the impact of LAX employees using local retail and residential areas as convenient and “free” parking. Although many of those issues have been successfully resolved in cooperation with LAWA, the ATMP raises fresh questions about this issue including where the 1500 employee parking spaces for American Airlines set for removal from World Way are to be relocated.

We also remain committed to support for alternative access to LAX other than by automobile and find insufficient information regarding encouraging pedestrian access in/out of the CTA and to the Westchester Business District.

Likewise, it is unclear what impact the redesigned roadway will have on the operations at the Parking Spot located at Westchester and Sepulveda. We understand that a few such questions necessarily crossover from CEQA issues to operational decisions including questions relating to CTA access by rideshare services, hotel and parking shuttles.

As we have pointed out with all other LAWA projects we have reviewed, it remains crucial that construction staging and access must be designed to make extremely limited use of Westchester Parkway and shall only be used as truly necessary in order to reduce local impacts. This includes materials and truck deliveries as well as construction workers who should all be directed to follow a traffic plan down Imperial Highway to the western parts of the airport.

Our airline members are concerned about the loss of “space” that is currently used for which there is no apparent plan to replace. As identified on Table 2-4, the space concerns include:

1. Aircraft parking (T9 Site) (page 2-65)
2. LAWA operations aircraft parking (T9 Site) (page 2-66)
3. Impact on LAXFUEL current and future potential needs (page 2-63)
4. A portion of cargo staging space (Twy C Extension) (page 2-65)

Sufficient aircraft parking space has been a challenge at LAX for an extended period of time and the proposal to reduce space has the potential to limit future activity. As airlines plan their network flight schedules, particularly those who operate in either a hub-spoke structure and/or with slot/curfew restrictions, access to remain overnight (RON) or extended aircraft rest space can be a critical factor when deciding what flights may or may not be offered at a particular destination. As plans are further refined, the airline community strongly encourages LAWA to seriously consider alternate uses of space to preserve and create aircraft parking areas.

Regarding space for LAXFUEL, the airline community would like to ensure that sufficient land, facilities, and other infrastructure is available for operations at time of construction as well as capacity for any forecasted future needs. Has there been an assessment of what needs might be associated with operations in future years?

There are furthermore concerns raised about cargo facility replacement issues which would have reduced environmental impacts if consolidated to the east side of the airport where trucking access would be more proximate to major highways. Furthermore, volume at many of the cargo areas exceeds



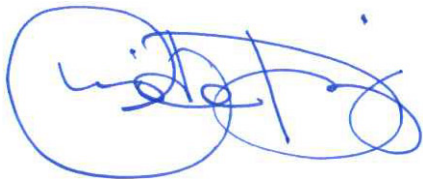
capacity today. Further reduction in space would place limitations on how much cargo could be processed through the facility. Have alternatives been considered to retain an equivalent amount of space for cargo staging?

In particular, as LAX is aware, Mercury Air Cargo (a subsidiary of one of the Chamber's oldest member companies & longest non-airline tenant at LAX, Mercury Air Group) operates a warehouse on Avion Drive which is slated for demolition under the modernization plan. Mercury handles 11 foreign airlines at this location, all of which are vital to LA as a hub for international trade. The Chamber highlights the importance of LAX working with Mercury on options for its continued operation and service to these airlines elsewhere on the airport.

The LAX Coastal Area Chamber of Commerce requests responses to the concerns raised herein and looks forward finding refinements to the overall plan to resolve such issues.

As a final note, we applaud LAWA and its planning team on how far it has come in designing this proposal from the ones first seen more than two decades ago. It was worth the wait.

Very truly yours,

A handwritten signature in blue ink, consisting of several loops and a vertical line, positioned above the title 'President/CEO'.

President/CEO

**From:** [CRUZ, OHASSY C.](#)  
**To:** [OWEN, JAMES L.](#)  
**Subject:** FW: Addition to Our LAX Comment Form: Notification  
**Date:** Monday, March 15, 2021 4:19:01 PM

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**From:** FABIAN RAYGOSA via Smartsheet <automation@app.smartsheet.com>  
**Sent:** Monday, March 15, 2021 4:12 PM  
**To:** CRUZ, OHASSY C. <OCRUZ@lawa.org>  
**Subject:** Addition to Our LAX Comment Form: Notification



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

Changes since 3/15/21 4:10 PM

1 row added

4 attachments added

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1 row added or updated (shown in yellow)

Row 85

|                      |   |
|----------------------|---|
| <b>Row ID</b>        | 85  |
| <b>Full Name</b>     | Robert Acherman   |
| <b>Company Name</b>  | Alliance for a Regional Solution to Airport Congestion  |
| <b>Email Address</b> | <a href="mailto:robertacherman@aol.com">robertacherman@aol.com</a>  |
| <b>Comments</b>      | Attached are ARSAC's comments to the ATMP DEIR. There are four documents: 1. Letter from Attorney Doug Carstens, 2. ARSAC Cover Letter and Comment Letter, 3. ARSAC EIR NOP Letter May 5, 2019 and ARSAC EA NOP Letter July 30, 2019. |
| <b>Created</b>       | 03/15/21 4:10 PM  |
| <b>Project</b>       | ATMP-Draft EIR  |

Changes made by [web-form@smartsheet.com](mailto:web-form@smartsheet.com)

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4 attachments added



[2021-03-12 Letter to LAWA re ATMP fnl.pdf \(189k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 85: Robert Acherman



[ARSAC ATMP NOP 7-30-2019.pdf \(50k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 85: Robert Acherman



[ARSAC ATMP NOP 5-6-2019.pdf \(68k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 85: Robert Acherman



[ARSAC LAWA ATMP DEIR comments 3-15-2021.pdf \(687k\)](#) added by [web-form@smartsheet.com](mailto:web-form@smartsheet.com) on Row 85: Robert Acherman

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March 12, 2021

Evelyn Quintanilla  
 Chief of Airport Planning II  
 Los Angeles World Airports  
 P.O. Box 92216  
 Los Angeles, CA 90009-2216  
*LAWA.org upload*

Re: Airfield and Terminal Modernization Project Draft EIR Comments

Dear Ms. Quintanilla,

These comments to the Airfield and Terminal Modernization Project (“ATMP”) Draft Environmental Impact Report (DEIR) are being provided on behalf our client, the Alliance for a Regional Solution to Airport Congestion (“ARSAC”). These comments are provided per ARSAC’s right under the ARSAC-LAWA Memorandum of Understanding (hereinafter “MOU”) which went into effect in September 2016. ARSAC’s right to comment on Environmental Impact Reports (“EIRs”) to help LAWA be more efficient in obtaining approval for projects extends to raising quality issues of the EIR where projects or project components do not comply with the National Environmental Quality Act (“NEPA”), the California Environmental Quality Act (“CEQA”), the 2006 Stipulated Settlement Agreement (“SSA”), the 2016 ARSAC-LAWA MOU and/or other laws, rules and regulations. The MOU provides the parameters for the ATMP and it appears the LAWA has disregarded the MOU in preparing the ATMP DEIR.

ARSAC has several issues with the ATMP DEIR:

1. Failure to comply with MOU provisions;
2. Unstable project description;
3. Use of a future baseline;
4. Availability of traffic data and impact assessments;
5. Non-responses planned for non-environmental comments.

**I. THE PROJECT FAILS TO COMPLY WITH MOU PROVISIONS**

Since its founding in 1995, ARSAC has been advocating for increased utilization of unconstrained, outlying regional airports such as Ontario and Palmdale instead of expanding LAX. ARSAC supports a safe, secure, modern and convenient LAX so long as LAX does not expand into surrounding LAX communities.

ARSAC has supported the implementation of the Landside Access Modernization Plan (“LAMP”) as a part of the MOU. ARSAC expects that LAWA hold up its end of the MOU with

regard to the Airfield and Terminal Modernization Project (“ATMP”), specifically decommissioning of all 18 West Remote gates, gate caps and gate configuration requirements and the scope of the Interim North Airfield Safety Improvement Program (“I-NASIP”).

ARSAC has regularly provided comments on environmental documents and has produced a number of position papers on LAX and regionalization of air travel in Southern California. ARSAC has also been a party to key legal settlements with LAWA: the 2006 Stipulated Settlement Agreement (“SSA”) and the 2016 ARSAC-LAWA MOU. Both of the settlements have provided requirements on LAWA to limit the number of passenger gates. In the 2006 Stipulated Settlement Agreement, Section X provided that LAWA limited the number of gates at LAX to 153 gates. Section X, Paragraph Y noted that the number of gates would be lowered to 153 gates if LAWA performed a Specific Amendment Study (“SPAS”). All of the SPAS alternatives limited LAX to 153 passenger gates. In 2013, the Board of Airport Commissioners (“BOAC”), the Los Angeles City Council and Mayor Antonio Villaraigosa approved SPAS. In 2016, ARSAC and LAWA settled litigation over SPAS which resulted in the MOU. The MOU incorporated the 153 gate cap section from the SSA and extended the 153 gate cap from December 31, 2020 to December 31, 2024. In addition, the MOU provided that if LAWA issued Notices of Preparation (“NOPs”) for relocation of the West Remote Gates, then terminal specific gate limitations would be in effect until December 31, 2030.

Before the preparation of the ATMP NOP for the CEQA EIR and NEPA Environmental Assessment (“EA”), LAWA invited ARSAC board members to see a presentation of the project and to make comments. ARSAC President Denny Schneider, Vice President Robert Acherman and board members Danna Cope and David Mishevich attended both meetings. At the first meeting, Denny Schneider gave LAWA Deputy Executive Director Samantha Bricker a hard copy of the MOU. During both meetings and in subsequent correspondence by ARSAC to LAWA Planning Deputy Evelyn Quintanilla, it was clearly stated that the EIR must include reference to the MOU. When the NOP was issued, it appeared that some of the elements of the MOU were to be included in the DEIR such as the decommissioning of all 18 of the West Remote Gates. When LAWA released the ATMP DEIR on October 29, 2020, all of the alternatives failed to include removal of the 18 West Remote gates and the planned gate configurations violated the provisions of the MOU. It is clear to ARSAC that LAWA disregarded the MOU and LAWA’s obligations under the MOU. LAWA’s excuse for retaining any number of West Remote gates for “operational flexibility” flies in the face in LAWA’s long-term goal of decommissioning the West Remote gates as shown in the City of Los Angeles’s approval of LAX Master Plan Alternative D in 2004, the Federal Aviation Administration Record of Decision (ROD) on Alternative D in May 2005 (page 17, [https://www.faa.gov/airports/environmental/records\\_decision/lax/media/rod\\_los\\_angeles.pdf](https://www.faa.gov/airports/environmental/records_decision/lax/media/rod_los_angeles.pdf)), the 2006 SSA (Section IV, Gates) and the 2016 MOU (Appendix A, Section II, Paragraph B).

When LAWA issued the ATMP NOP on April 4, 2019, it activated MOU Appendix A, Section II provisions. Since LAWA declared in the MOU that all 18 of the West Remote gates would be decommissioned (Exhibit A, Section 2, Paragraph B), this NOP served as the first and final in a series of NOP to decommission the West Remote Gates. Not only is the 153 gate cap from the 2006 SSA in effect to December 31, 2024, there are additional provisions that extend gate controls out to December 31, 2030. These gate controls include terminal or groups of terminal specific gate limits, gate size limitations of no smaller than an Aircraft Design Group III size, no bifurcation of gates (i.e. use of Multiple Apron Ramp System “MARS” gates) and no double-parking of aircraft at passenger gates (i.e. an aircraft loading or unloading passengers from two distinct gates). Another provision regards the one-for-one replacement of West Remote Gates into the Passenger Terminal Modernization Area (“PTMA”) into either the Midfield Satellite Concourse (“MSC”) Phase 2 (South), a northerly extension of the Tom Bradley International Terminal, into the proposed Concourse 0 and/or proposed Terminal 9. As indicated in the ATMP NOP, the American Eagle gates east of Sepulveda are to be relocated of the already approved MSC project.

|                                       | MOU    | Project             | Alt 1    | Alt 2           | Alt 3           | Alt 4               |
|---------------------------------------|--------|---------------------|----------|-----------------|-----------------|---------------------|
| <b>West Remote Gates</b>              | 0      | 3                   | 6 to 9   | 9               | 3               | 3                   |
| <b>Bifurcated gates</b>               | No     | Yes, MSC, CO and T9 | Yes, MSC | Yes, MSC and C0 | Yes, MSC and T9 | Yes, MSC, CO and T9 |
| <b>T1, T2, T3 gate limits</b>         | 40     | 38                  | 38       | 38              | 38              | 38                  |
| <b>TBIT gate limits</b>               | 19     | 19                  | 19       | 19              | 19              | 19                  |
| <b>T4, T5, T6, T7, T8 gate limits</b> | 64     | 66                  | 66       | 66              | 66              | 66                  |
| <b>MSC North gate limits</b>          | 12     | 15*                 | 15*      | 15*             | 15*             | 15*                 |
| <b>American Eagle</b>                 | 0      | 0                   | 0        | 0               | 0               | 0                   |
| <b>MSC South</b>                      | Note 1 | 8                   | 8        | 8               | 8               | 8                   |

|                      | MOU    | Project   | Alt 1 | Alt 2    | Alt 3     | Alt 4     |
|----------------------|--------|-----------|-------|----------|-----------|-----------|
| <b>Bradley North</b> | Note 2 | 0         | 0     | 0        | 0         | 0         |
| <b>Concourse 0</b>   | Note 2 | 8         | 0     | 8 to 11* | 0         | 8 to 11*  |
| <b>Terminal 9</b>    | Note 2 | 12 to 18* | 0     | 0        | 12 to 18* | 12 to 18* |

(\*) : Bifurcated gates

Note 1: Gates from American Eagle facility moving to MSC South for 8 gates.

Note 2: West Remote Gates can be relocated to Bradley North, MSC South, proposed Concourse 0 and/or Terminal 9.

**LAX ATMP DEIR 2.4.2.3 Removal/Replacement of West Remote Gates**

“In summary, the accounting of gates associated with Concourse 0, Terminal 9 and the West Remote Gates depends upon their utilization by aircraft type, in terms of narrowbody aircraft or widebody aircraft, which can vary over time, even during the course of the day.”

LAWA also failed to include any discussion of ARSAC’s request to have completion of the Runway Status Lights (“RWSL”) and the installation of Enhanced Final Approach Runway Occupancy Signal (“eFAROS”) included as components of the Airfield Element of the DEIR. This was listed on Attachment 1 to Exhibit A of the MOU as well as in ARSAC’s NOP comment letters and conversations with Evelyn Quintanilla. ARSAC has strongly advocated for safety improvements at LAX including improved airfield signage and lighting and enhanced taxiway and runway markings. ARSAC was a leader in getting FAA approval of the Runway Status Lights (RWSL) system at LAX which has dramatically reduced runway incursions at LAX. ARSAC has and will continue to insist that LAWA and the City of Los Angeles lobby the FAA for at least 47 controllers to be assigned to the LAX tower full time. Finally, ARSAC’s advocacy for eFAROS is to add another layer of protection to warn pilots if it is not safe to land on a runway.

Furthermore, LAWA failed to lease land to the AQMD to set up an air quality monitoring location. Moreover, data gathered from this site would have been useful in the ATMP DEIR to understand the effects of airport operations and surrounding traffic on airport neighbors, airport workers and the traveling public.

**II. THE DEIR FAILS TO PROVIDE A STABLE PROJECT DESCRIPTION**

The DEIR’s Project definition is unstable because of multiple gate configurations which are also prohibited by the MOU. The multiple gate configurations include bifurcation, and use of MARS gates.

The DEIRs failure to provide a stable project description violates CEQA. (Cal. Code Regs., tit. 14 [“CEQA Guidelines”] § 15124; *Cty. of Inyo v. City of Los Angeles* (1977) 71 Cal. App. 3d 185, 193 [“An accurate, stable and finite project description is the Sine qua non of an informative and legally sufficient EIR.”].) “A curtailed or distorted project description may stultify the objectives of the reporting process.” (*Cty. of Inyo, supra*, 71 Cal.App.3d 185, 192.) The DEIR fails this requirement because it calls for multiple gate configurations that are prohibited by the MOU. The DEIR must specify a “stable proposed project,” and not merely present a list of alternatives or potential project proposals. (*Washoe Meadows Community v. Department of Parks and Recreation*, 17 Cal.App.5th 277, 288.) “[F]or a project to be stable, the DEIR, the FEIR, and the final approval must describe substantially the same project.” (*Ibid.*) Failure to present a stable project description obstructs CEQA’s informational requirements by “present[ing] the public with a moving target and requir[ing] a commenter to offer input on a wide range of alternatives that may not be in any way germane to the project ultimately approved.” (*Ibid.*)

In a more recent case, *Stoipthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1 (“*Millennium*”), the appellate court upheld a ruling that a project description was inadequate under CEQA when the EIR failed to specify “the siting, size, mass, or appearance of any building proposed to be built at the project site.” (*Id.* at 18.) Rather, the project EIR provided an “impacts envelope” with “conceptual” designs. (*Ibid.*) The DEIR thus cannot propose multiple, conceptual configurations of the project design.

### **III. THE DEIR IMPROPERLY USES A FUTURE PROJECT BASELINE**

The DEIR improperly uses a future project baseline for the Project and for the traffic study, in contravention of CEQA. Under CEQA Guidelines section 15125, subdivision (a), the baseline must “describe physical environmental conditions *as they exist at the time the notice of preparation is published*, or if no notice of preparation is published, at the time environmental analysis is commenced, from both a local and regional perspective.” (Emphasis added.) An EIR may deviate to use projected future conditions as the sole baseline “*only if it demonstrates with substantial evidence that use of existing conditions would be either misleading or without informative value to decision-makers and the public. Use of projected future conditions as the only baseline must be supported by reliable projections based on substantial evidence in the record.*” (CEQA Guidelines § 15125, subd. (b), emphasis added.)

The Notice of Preparation (“NOP”) for this project was published in April 2019; therefore, the appropriate baseline for the ATMP DEIR under CEQA Guidelines section 15125, subdivision (a) would be 2019. However, in the ATMP DEIR, LAWA is seeking to use a 2023/2024 baseline for certain noise, air quality, and greenhouse gas impacts associated with temporary runway closures, as well as a 2028 baseline for the traffic study. (DEIR, p. 4-3 to 4-4.) ARSAC is concerned that using these baseline years, years which have not yet occurred, will provide a false basis for determining project impacts. Although commercial air traffic is currently down 75% from this time period one year ago due to COVID-19, the collective



opinions of the airlines, aircraft manufacturers and airline trade associations is that air travel will recover to 2019 levels by 2023 or 2024. The California Supreme Court has recognized that use of a future baseline without a discussion of current conditions is a ‘departure from the norm’ and should only apply if ‘justified by unusual aspects of the project or the surrounding conditions.’ (*Neighbors for Smart Rail v. Exposition Metro Line Construction Authority* (2013) 57 Cal.4th 439, 451.) A lead agency needs to provide a well-documented and reasoned justification for choosing a baseline year later than the publication of the NOP. (*Id.* at 460.)

With regards to the noise, air quality, and greenhouse gas impacts analyses associated with temporary runway closures, the DEIR uses a baseline of 2023 or 2024, the year of each anticipated temporary runway closure. (DEIR, p. 4-3.) For 4.5 months during each of these years when a runway closure occurs, aircraft operations will be redistributed to the remaining three runways. (DEIR, p. 4-3.) The DEIR states that this baseline is appropriate because it “accounts for the five to six interim years of growth in aircraft operations projected to occur at LAX.” (DEIR, p. 4-3.) This conclusory statement does not provide substantial evidence that the use of existing conditions would be misleading. (See *Concerned Citizens of Costa Mesa, Inc. v. 32nd Dist. Agricultural Assn.* (1986) 42 Cal.3d 929, 935 [“[T]he EIR must contain facts and analysis, not just the agency’s bare conclusions or opinions.”].) The DEIR states without supporting evidence that “the level of aircraft operations that exist in 2023 and 2024 will differ from those conditions that existed in 2019.” (DEIR, p. 4-3.) The supposition that the aircraft conditions in 2023 and 2024 “will differ” from those in 2019 is not sufficient to justify a deviation from the 2019 baseline. The DEIR must instead make a showing of substantial evidence that use of a 2019 baseline would be misleading or without informational value. The DEIR has not done that here. LAWA fails to provide a justification except that using 2018 as a baseline would be confusing. This is not an argument backed by substantial evidence. While the volume of air traffic is currently down due to the COVID-19 pandemic, air travel is expected to recover beyond 2022.

With regards to the transportation analyses, the DEIR claims for measuring VMT impacts, a 2028 baseline is necessary to account for several transportation improvements that will have been completed at that time, which may impact traffic at the Project site. (DEIR, p. 4-4, 4.8-33 to 4.8-37.) Yet the DEIR does not provide substantial evidence that using a 2019 baseline would be misleading or have no informative value. In fact, the model calculating the 2028 baseline itself uses some assumptions based on 2019 data. (DEIR, p. 4.8-36 [“[T]he 2019 data was used to provide the basis for the assumptions on where trips would start/end at a variety of airport facilities.”].) The existing conditions for 2019 show a much smaller VMT (6,581,811) than the projected baseline of 2026 (8,676,209). (DEIR, p. 4.8-41.) This difference of over 2 million VMT will artificially and unjustifiably inflate the Project baseline, and thereby minimize the Project’s potential impacts.

LAWA has claimed in the EIR that the number of passengers and associated vehicle traffic will increase whether or not the project is done. In addition, the ground traffic has existed prior to the project start. The introduction of new roadways to mitigate LAX ground traffic is

not creating a new activity where there has been none before as new activity traffic was created in the case of the Metro Expo Line.

#### **IV. AVAILABILITY OF TRAFFIC DATA AND IMPACT ASSESSMENTS**

Although CEQA has replaced traffic congestion with Vehicle Miles Travelled (VMT), LAWA still has two responsibilities. The first responsibility is under CEQA and NEPA for air quality analysis. The second responsibility is under the City of Los Angeles Department of Transportation (LADOT) non-CEQA requirement for VMT analysis. At this point, we understand that the LADOT required data will not be available at the same time as the ATMP Final EIR. This is problematic as decision makers (i.e. Board of Airport Commissioners, Los Angeles City, Mayor Eric Garcetti, etc.) and the public will be denied the information needed to make an informed decision of all impacts of the ATMP. (*Sierra Club v. County of Fresno* (2018) 6 Cal.5th 502, 515 [“The failure to comply with the law subverts the purposes of CEQA if it omits material necessary to informed decisionmaking and informed public participation.”].)

#### **V. NON-RESPONSES TO NON-ENVIRONMENTAL COMMENTS**

LAWA must respond to all comments submitted regarding their DEIR and cannot bifurcate them into environmental comments that will be answered and non-environmental comments that will not be answered in the DEIR and may or may not be answered somewhere else. Many responses in the June 2017 Final EIR for the LAX Terminals 2 and 3 Modernization Project Final EIR were “No response is required because the comment does not raise any significant environmental issues or address the adequacy of the environmental analysis.” As noted on page 4, ARSAC letter to LAWA CEO Justin Erbacci dated October 28, 2020: “A public agency may not overbroadly classify certain comments as “non-environmental” and then fail to respond to them.” Comments by the public require a response so that issues will not be swept under the rug. (*King & Gardiner Farms, LLC v. County of Kern* (2020) 45 Cal.App.5th 814, 880 (“*KG Farms*”).) CEQA Guidelines section 15088, subdivision (a) requires that “[t]he lead agency shall evaluate comments on environmental issues... and shall prepare a written response.” CEQA Guidelines §15088, subd. (c) provides the following standard: “The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general).” *KG Farms* states the following rule (and finds that the response to comments was insufficient): “The detail required of a response is correlated to the detail in the comment.” (*KG Farms, supra*, 45 Cal. App. 5th 814, 880.) So does *Covington v. Great Basin Unified Air Pollution Control District*: “The level of detail in the response may correspond to the level of detail in the comment, so that a general response is sufficient to a general comment, but a more detailed response is needed for a more detailed comment. (Cal. Code Regs., tit. 14, 15088, subd. (c).)” (*Covington v. Great Basin Unified Air Pollution Control Dist.* (2019) 43 Cal. App. 5th 867, 879.)

**VI. CONCLUSION**

In order to fulfill the requirements of CEQA and of the MOU, ARSAC is willing to help LAWA make the necessary revisions to the ATMP EIR and develop an MOU-compliant alternative.

Sincerely,

A handwritten signature in blue ink, appearing to read "Douglas P. Carstens".

Douglas P. Carstens



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March 15, 2021

Evelyn Quintanilla  
Chief of Airport Planning II  
Los Angeles World Airports  
PO Box 92216  
Los Angeles, CA 90009-2216

Re: Comments of the Draft Environmental Impact Report (DEIR) for the LAX Airfield & Terminal Modernization Project (ATMP), State Clearinghouse No. 2019049020

Dear Ms. Quintanilla:

ARSAC, the Alliance for a Regional Solution to Airport Congestion, submits this cover letter, a comment letter from our attorneys, Chatten-Brown, Carstens and Minter, and our comments and questions on the DEIR pursuant to ARSAC's right to submit comments under Section II of the ARSAC-LAWA Memorandum of Understanding (MOU). The purpose of the letters and the comments is to help LAWA refining the proposed AMTP to achieve greater efficiency and mitigate impacts. Furthermore, ARSAC sees that it is within its rights under the MOU to provide comments that point out deficiencies and/or errors that LAWA has self-inflicted in the ATMP environmental and other planning documents and for ARSAC to offer suggestions to remedy those deficiencies and/or errors.

Since 1995, ARSAC, a grassroots community organization, has advocated for increased utilization of legally unconstrained outlying regional airports to meet Southern California's airport capacity needs. ARSAC supports a modern, safe, secure and convenient LAX so long as LAX does not expand into surrounding airport communities. ARSAC has had two legal settlements with LAWA: the 2006 Stipulated Settlement Agreement for the LAX Master Plan Alternative D case and the 2016 ARSAC-LAWA MOU for the LAX Specific Plan Amendment Study (SPAS) case. ARSAC and LAWA negotiated the MOU in good faith. While ARSAC has a duty to cooperate, it can only do so within the scope of the law and the MOU. ARSAC has held up its side of the MOU and expects LAWA to do the same.

In summary, ARSAC believes that LAWA has failed in its obligations under the MOU and CEQA and therefore requests that LAWA remedy those failures through the introduction of new alternatives that are compliant with the MOU. In addition, ARSAC requests LAWA's consideration and incorporation of mitigation measures and policy decisions into the ATMP.

The failure started at the outset of the ATMP Notice of Preparation (NOP) process for the EIR and Environmental Assessment (EA) when LAWA invited ARSAC to be consulted about the ATMP. To the public, the definition of "consultation" means that there is a presentation, questions and answers and agreement on a

**ARSAC** *Alliance for a Regional Solution to Airport Congestion*

decision. LAWA’s past performance in “consultation” has been a presentation and not making any changes in response to the party with whom they met. Essentially, LAWA has done this to “check the box” of claiming to have a consultation, but to the other party, this was only a briefing as their input was never considered or incorporated into LAWA’s plans. In the two NOP consultation meetings ARSAC had with LAWA Chief Commercial Officer Samantha Bricker and Chief of Airport Planning Evelyn Quintanilla, ARSAC brought up the MOU in the discussion, gave Ms. Bricker a hard copy of the MOU and sent two letters (attached) emphasizing the need to follow the MOU and reference the MOU in the ATMP EIR and EA. There are project specific requirements in the MOU that LAWA must follow in pursuing the environmental and planning approvals for the AMTP. The ATMP NOP appeared to follow the MOU, but the ATMP DEIR explicitly violated the terms of the MOU. Neither the NOP nor the DEIR make any reference to the MOU. ARSAC has raised these MOU violations in writing with LAWA and has had four meetings with top LAWA Executives, but to date LAWA has not made any changes to the ATMP DEIR or forthcoming Draft EA to show MOU compliance.

These failures include, but are not limited to:

1. Exceeding the 2024 and 2030 gate caps in the MOU Exhibit A, Section II.
2. Not relocating of all 18 West Remote Gates into the Passenger Terminal Modernization Area (PMTA) on a 1-for-1 basis.
3. Violating the prohibition on bifurcation of gates through the use of Multiple Apron Ramp System (MARS) gates.
4. Exclusion of Enhanced Final Approach Runway Occupancy Signal (eFAROS) in the Interim North Airfield Safety Improvements Project (I-NASIP).
5. Lack of a lease between LAWA and the Southern California Air Quality Management District (AQMD) for an air quality monitoring site near LAX.
6. CEQA violations such as improper use of future baseline years and failure to respond to non-CEQA comments in the EIR.

Our attorneys have addressed these legal failures in detail in their letter.

Since October 2018, ARSAC raised these failures to LAWA in several letters and meetings with senior LAWA Executives. As of March 10, 2021, LAWA has not provided acknowledgement of the failures or any action plan to correct them.

ARSAC has and will enforce its rights under the MOU to compel LAWA to comply with the MOU. ARSAC is willing to work with LAWA on developing MOU compliant alternatives. We look forward to your response.

Sincerely,



Denny Schneider  
President  
[denny@welivefree.com](mailto:denny@welivefree.com) (213) 675-1817



Robert Acherman  
Vice President  
[robertacherman@aol.com](mailto:robertacherman@aol.com) (310) 927-2127

***ARSAC Alliance for a Regional Solution to Airport Congestion***

cc: Doug Carstens, ARSAC Counsel, Chatten-Brown, Carstens and Minter, LLP  
Hon. Eric Garcetti, Mayor, City of Los Angeles  
Hon. Mike Bonin, Council Member, 11th District, City of Los Angeles  
Hon. Maxine Waters, Member of Congress  
Hon. Ted Lieu, Member of Congress  
Hon. Karen Bass, Member of Congress  
Hon. Hilda Solis, Supervisor, District 1, County of Los Angeles  
Hon. Holly Mitchell, Supervisor, District 2, County of Los Angeles  
Hon. Sheila Kuehl, Supervisor, District 3, County of Los Angeles  
Hon. Janice Hahn, Supervisor, District 4, County of Los Angeles  
Hon. Kathryn Barger, Supervisor, District 5, County of Los Angeles

Attachments:

2016 ARSAC LAWA MOU and clean copy of PTMA map (Link to file; size is 16 MB):

[https://clkrep.lacity.org/onlinedocs/2016/16-0910\\_misc\\_10-16-2017.pdf](https://clkrep.lacity.org/onlinedocs/2016/16-0910_misc_10-16-2017.pdf)

[https://clkrep.lacity.org/onlinedocs/2016/16-0910\\_misc\\_1\\_10-16-2017.pdf](https://clkrep.lacity.org/onlinedocs/2016/16-0910_misc_1_10-16-2017.pdf)

ARSAC NOP comment letter May 6, 2019

ARSAC NOP comment letter July 30, 2019

## MEMORANDUM OF UNDERSTANDING

This Memorandum of Understanding (the "Agreement") is made and entered into as of this \_\_\_ day of \_\_\_, 2016, by and between the City of Los Angeles and its Department of Airports (Los Angeles World Airports or "LAWA"), acting by and through its Board of Airport Commissioners (BOAC) (collectively, "LOS ANGELES" or "City"<sup>1</sup>), on the one hand, and The Alliance for a Regional Solution for Airport Congestion (ARSAC), an unincorporated association, Denny Schneider (an individual and President of ARSAC) and Robert Acherman, an individual and Vice President/Treasurer of ARSAC) (collectively referred to herein as "The ARSAC Parties"), on the other (collectively the "Parties").

WHEREAS, LOS ANGELES and ARSAC and others entered into a "Stipulated Settlement Agreement" dated February 17, 2006 (the "Prior Settlement");

WHEREAS, ARSAC expressed legal and policy concerns regarding the completed Specific Plan Amendment Study ("SPAS") California Environmental Quality Act ("CEQA") Environmental Impact Report ("EIR") and on May 30, 2013 filed a writ petition challenging it in Los Angeles Superior Court, Case Number BS143086, transferred and consolidated with Ventura County Superior Court Case No. 56-2014-00451038-CU-WM-OXN (the "SPAS Writ Action");

WHEREAS, on April 12, 2016, the trial court entered judgment in favor of LOS ANGELES, denied ARSAC's SPAS Writ Petition, and awarded costs to LOS ANGELES and this judgment is now on appeal;

WHEREAS, LOS ANGELES, as the prevailing party in the SPAS Writ Action, has submitted a cost bill to the Court in the amount of \$251,860;

WHEREAS, ARSAC has disputed the amount of costs to be awarded and has filed a Motion to Tax Costs ("Cost Motion") and a Notice of Appeal from the trial court's judgment ("Appeal");

WHEREAS, the Parties desire to resolve the SPAS Writ Action Costs Motion and the Appeal without further cost and expense;

WHEREAS, LAWA is planning an LAX Landside Access Modernization Program ("LAMP") for Los Angeles International Airport ("LAX") which would include, but not be limited to, an Automated People Mover/LAX Train ("APM"), East and West Intermodal Transportation Facilities ("ITF"s), a Consolidated Rental Car Facility ("ConRAC"), a Connection to the Metro regional train system and associated projects;

WHEREAS, the nature, scope, size and capacity of the proposed projects within LAMP is broadly described in Exhibit B;

<sup>1</sup> The Terms "LOS ANGELES" and "The City" when used in this Agreement shall include The City of Los Angeles, its City Council, Mayor, Board of Airport Commissioners (BOAC), Department of Airports (LAWA) and LAWA's Chief Executive Officer.

*8/10/16*

WHEREAS, LAWA is analyzing the LAMP pursuant to CEQA, the National Environmental Policy Act (NEPA) and related federal and state laws;

WHEREAS, LAWA is considering interim safety improvements to the LAX north airfield complex (the "Interim North Airfield Safety Improvement Program" or I-NASIP);

WHEREAS, LAWA is planning improvements to passenger gate facilities at LAX, including the relocation of West Remote Gates (the "West Remote Gate Relocation Program") and the development of additional new passenger gate facilities within the Passenger Terminal Modernization Area (the "PTMA") as shown in Exhibit D to this Agreement) (collectively referred to herein as PTMA Projects);

WHEREAS, projects within LAMP, the I-NASIP, the West Remote Gate Relocation Program, and the development of new passenger gate facilities within the PTMA may require certain actions by LOS ANGELES, the Federal Aviation Administration ("FAA"), Federal Highway Administration ("FHWA"), Federal Transit Administration ("FTA"), Southern California Association of Governments ("SCAG") and other government entities, including compliance with environmental review requirements under CEQA, NEPA, the Clean Air Act, Section 4(f) of the Department of Transportation Act, the National Historic Protection Act and other laws;

WHEREAS, the ARSAC Parties and LAWA agree to cooperate in implementing LAMP, I-NASIP, the West Remote Gate Relocation Program and the development of new passenger gate facilities with the PTMA;

WHEREAS, the ARSAC Parties and LOS ANGELES desire and intend that LAMP, I-NASIP, the West Remote Gate Relocation Program and the development of new passenger gate facilities within the PTMA proceed through local, state and federal approvals and environmental review, administrative and legislative consideration, and, if approved, through implementation, without litigation;

NOW, THEREFORE, in consideration of and in reliance upon the mutual covenants of the Parties expressed in this Agreement, the Parties agree as follows:

**SECTION I: GENERAL PROVISIONS**

- A. **Recitals True and Correct.** The above recitals are true and correct and are hereby incorporated as part of this Agreement.
- B. **No Admissions.** This Agreement does not constitute an admission by any Party with respect to any matter at issue in the SPAS Writ Action.
- C. **Regulatory Prohibitions.** Notwithstanding any provision of this Agreement, LOS ANGELES will not be required to expend any funds or take any actions that are prohibited or disapproved by the FAA or any other regulatory agency or by any local, state or federal law, regulation or requirement FAA approval may be required prior to the use of airport revenue (as defined by the FAA) to fund LAWA's obligations under this Agreement. LAWA will determine, in its sole



discretion, whether, when and how it may seek FAA approval for any use of airport revenue pursuant to this Agreement. Notwithstanding any provision of this Agreement, LOS ANGELES will not be required by this Agreement, either directly or indirectly, to take any action that would constitute (i) a violation of any FAA grant assurance entered into by LOS ANGELES or (ii) a waiver of LOS ANGELES' Police Power.

- D. **No General Fund Expenditure Required.** Under no circumstances may any of the obligations under this Agreement require any payments from LOS ANGELES' General Fund or from any other LOS ANGELES-controlled source of funds other than airport revenue.
- E. **No Third Party Beneficiaries.** Except as otherwise provided in Section II.C. (ARSAC PARTIES COMMITMENTS AND OBLIGATIONS) of this Agreement, this Agreement has no third party beneficiaries, and no one other than the Parties will have any right to enforce any of the obligations created by this Agreement.
- F. **Term.** The provisions of this Agreement shall be operational through the earlier of the dates specifically set forth therein, or December 31, 2030.

## SECTION II: ARSAC PARTIES COMMITMENTS AND OBLIGATIONS

- A. **Immediate Dismissal of SPAS Litigation And Appeal.** Within two (2) business days of execution of this Agreement by all Parties, ARSAC will dismiss, with prejudice, ARSAC's Appeal in the SPAS Writ Action and will withdraw its Motion to Tax Costs. Except as otherwise stated in Exhibit A hereto, each party will bear its own attorney's fees and costs. The form of dismissal to be filed in the SPAS Writ Action by ARSAC is attached to this Agreement as Exhibit E. The ARSAC Parties covenant and agree, individually and collectively, that they will not directly or indirectly commence, prosecute or fund any additional lawsuits or administrative complaints regarding the Specific Plan Amendment Study or its environmental review process.
- B. **Duty To Cooperate.** The ARSAC Parties agree to cooperate with LOS ANGELES in its efforts to obtain all required approvals for and to implement LAMP, I-NASIP, the West Remote Gate Relocation Program and the development of additional new passenger gate facilities within the PTMA as expeditiously as possible. Notwithstanding the foregoing, nothing herein is intended to prevent or discourage ARSAC Parties from submitting comments during the environmental review process and/or administrative proceedings that would assist LAWA in refining proposed projects to achieve greater efficiency or mitigate impacts.
- C. **Covenant Not To Sue.** The ARSAC Parties covenant and agree, individually and collectively, that they will not directly or indirectly commence, prosecute or fund any lawsuits or administrative complaints against the City, that could delay,

prevent, impede, alter or affect in any way the approval or implementation of any project within LAMP (with the size and capacity shown in Exhibit B), I-NASIP, the West Remote Gate Relocation Program or the development of new passenger gate facilities within the PTMA. The ARSAC Parties further covenant and agree, individually and collectively, that they will not directly or indirectly commence, prosecute or fund any lawsuits or administrative complaints, or intervene in any lawsuits or administrative proceedings, involving the environmental review or the approval by any local, state or federal agency of any project within LAMP, I-NASIP, the West Remote Gate Relocation Program or the development of new passenger gate facilities within the PTMA. Notwithstanding the foregoing, nothing herein is intended to prevent or discourage ARSAC Parties from submitting comments during the environmental review process and/or administrative proceedings that would assist LAWA in refining proposed projects to achieve greater efficiency or mitigate impacts.

1. The ARSAC Parties acknowledge and agree, individually and collectively, that this Agreement may be pleaded as a defense to any such litigation by the City or by any local, state or federal agency that is subject to a lawsuit, administrative complaint or intervention by any ARSAC Party with respect to the review, approval or implementation of any project within LAMP, I-NASIP, the West Remote Gate Relocation Program or the development of new passenger gate facilities within the PTMA.
2. If any of the ARSAC Parties violates the provisions of this Section II.C, the City shall have no further obligations whatsoever under this Agreement.

**D. ARSAC Representative.** ARSAC will designate in writing one individual as the "ARSAC Representative" authorized to speak or act on behalf of ARSAC for all purposes under this Agreement and will provide LAWA with contact information for the designated ARSAC Representative.

**SECTION III: LAWA COMMITMENTS AND OBLIGATIONS**

LAWA Commitments and Obligations are set forth in Exhibit A attached hereto and incorporated herein by reference.

**SECTION IV: DISPUTE RESOLUTION AND ENFORCEMENT**

**A. Informal Dispute Resolution.**

1. If any Party believes that another Party has breached or otherwise failed to perform this Agreement, the aggrieved Party shall first attempt promptly to resolve the problem through informal communications with the designated points of contact. If such efforts fail, the aggrieved Party shall promptly provide the other Party written notice of the alleged breach or failure of performance and allow the other Party thirty (30) days to cure



the alleged breach or failure of performance or otherwise to resolve the dispute. If these efforts fail to resolve the dispute, the aggrieved party may, but is not required to, request mediation. Requests for mediation may be made no more than once every six (6) months.

2. If, after providing notice and opportunity to cure, ARSAC requests mediation, LAWA will pay for up to four days of mediation services in each calendar year, and LAWA will make available to ARSAC an annual amount up to \$25,000 in scientific or technical consultant services to assist in ARSAC's analysis of issues arising from LAWA's alleged failure of performance under this Agreement that will be the subject of mediation. Allowances for scientific or technical consultant services not used for mediation support in one year will not roll to the next or otherwise cumulate. ARSAC will identify the area of expertise for which it seeks scientific or technical assistance at the time ARSAC requests an annual mediation. LAWA will provide a choice of three (3) consultants with expertise in that area from which ARSAC may choose. LAWA will retain the chosen consultant and pay the chosen consultant subject to and in accordance with applicable City contracting requirements. LAWA will be the owner of any and all scientific or technical work product created by the consultants so retained, but such consultants will also directly provide ARSAC with all work product created; the work product will be subject to mediation confidentiality and will not be disclosed outside of mediation without LAWA's written consent. When mediation has concluded, the work product created by the consultants will become public records available upon request, unless it is the subject of on-going or anticipated litigation.

**B. Enforcement of this Agreement**

1. All Parties consent to the jurisdiction of the Ventura County Superior Court or other venue agreed to in writing by the parties, where all disputes arising under this Agreement are to be heard if mediation fails to provide a resolution.
2. **Specific Performance Sole Remedy.** The only relief that any Party may request in the event of a breach of this Agreement will be an order compelling specific performance. No party may seek monetary damages of any kind as a result of any alleged breach of this Agreement.

**SECTION V: NOTICES**

All notices will be in writing and will be addressed to the affected Parties at the addresses set forth below. Notices will be: (a) delivered by in person service to the addresses set forth below, in which case they will be deemed delivered on the date of delivery, as evidenced by the written report of the courier service, or (b) sent by certified mail, return receipt requested, in which case they will be deemed delivered three business days after deposit in the United States



mail. Any Party may change its address or the name and address of its attorneys by giving notice in compliance with this Agreement. Notice of a change will be effective only upon receipt. Notice given on behalf of a Party by any attorney purporting to represent a Party will constitute notice by the Party if the attorney is, in fact, authorized to represent the Party. The addresses of the Parties and their attorneys are:

If to LOS ANGELES:

Chief Executive Officer  
Los Angeles World Airports  
1 World Way  
P.O. Box 92216  
Los Angeles, California 90009-2216

With a copy to:

General Counsel to the Airport Division  
1 World Way  
Los Angeles, California 90009

If to ARSAC:

Denny Schneider  
President  
ARSAC  
7929 Breen Avenue  
Westchester CA 90045

With a copy to:

Douglas Carstens  
Chatten-Brown & Carstens LLP  
2200 Pacific Coast Highway, Suite 318  
Hermosa Beach, CA 90254

If to other ARSAC Parties:

Denny Schneider  
7929 Breen Avenue  
Westchester CA 90045

With a copy to:

Douglas Carstens  
Chatten-Brown & Carstens LLP  
2200 Pacific Coast Highway, Suite 318  
Hermosa Beach, CA 90254



Robert Acherman  
1504 Engracia Ave.  
Torrance, CA 90501-3105

With a copy to:

Douglas Carstens  
Chatten-Brown & Carstens LLP  
2200 Pacific Coast Highway, Suite 318  
Hermosa Beach, CA 90254

**SECTION VI: MISCELLANEOUS**

- A. **Legal Fees and Costs.** Each Party will bear its own legal fees and costs resulting from the preparation, negotiation, execution and enforcement of this Agreement and, except as set forth herein, the SPAS Writ Action and SPAS Writ Appeal.
- B. **Waiver.** The waiver of any provision or term of this Agreement will not be deemed a waiver of any other provision or term of this Agreement. The mere passage of time, or failure to act upon a default, will not be deemed a waiver of any provision or term of this Agreement.
- C. **Representation by Counsel.** Each of the Parties has been represented by counsel in the negotiation and drafting of this Agreement. Accordingly, this Agreement will not be strictly construed against any Party, and the rule of construction that any ambiguities be resolved against the drafting Party will not apply to this Agreement.
- D. **Interpretation.** Specific provisions of this Agreement will take precedence over conflicting general provisions.
- E. **California Law.** This Agreement will be construed in accordance with the laws of the State of California. The sole venue for any judicial enforcement action will be the Ventura County Superior Court, unless another venue is agreed to in writing by the Parties.
- F. **Entire Agreement.** This Agreement contains the entire agreement between the parties and, except as otherwise explicitly provided in this Agreement, supersedes any prior agreements, whether written or oral.
- G. **Authority of Signatories.** The individuals executing this Agreement represent and warrant that they have the authority to sign on behalf of the respective Parties for which they have executed this Agreement.
- H. **Binding and Enforceable Upon Signature.** As to any Party, this Agreement will be binding upon, and as of the date of, the Party's execution of this

Agreement. This Agreement will be enforceable by any Party and each Party's respective successors and assigns.

- I. Amendments.** This Agreement may not be altered, amended or modified, except by an instrument in writing signed by each of the Parties in existence at the time.
- J. Counterparts.** This Agreement may be executed in two or more counterparts, each of which may be deemed an original, but all of which will constitute one and the same document.
- K. Effective Date.** This Agreement will be effective upon execution by all parties.
- L. Severability.** If any term, provision, covenant, or condition of this Agreement is held by a court of competent jurisdiction to be invalid, void, or unenforceable, the remainder of the provisions will continue in full force and effect.
- M. Assignment, Successors and Assigns.** This Agreement may not be assigned without the written consent of the other party. If properly assigned, this Agreement will bind and inure to the benefit of the agents, assigns, and successors-in-interest of each Party.

**Remainder Of This Page Intentionally Left Blank; Signature Page Follows.**

APPROVED AS TO FORM:  
MICHAEL N. FEUER  
City Attorney

Date: September 9, 2016  
By: Tomothy J. [Signature]  
Deputy/Assistant City Attorney

LOS ANGELES WORLD AIRPORTS

Date: September 9, 2016  
By: [Signature]  
Chief Executive Officer  
Department of Airports

Date: 9/12/16

By: Susan Mengler  
Wei Chi  
Comptroller  
Department of Airports

APPROVED AS TO FORM:  
MICHAEL N. FEUER  
City Attorney

Date: September 9, 2016  
By: Tomothy J. [Signature]  
Deputy/Assistant City Attorney

CITY OF LOS ANGELES

Date: 12 SEP 2016  
By: E.G. [Signature]

APPROVED AS TO FORM:

Date: 8-5-2016  
By: [Signature]  
Douglas Carstens, Esq.

ALLIANCE FOR A REGIONAL SOLUTION FOR  
AIRPORT CONGESTION (ARSAC)

Date: 8-5-2016  
By: [Signature]  
President

Date: 8-5-2016  
By: [Signature]  
Denny Schneider

Date: AUGUST 5, 2016  
By: [Signature]  
Robert Acherman

[Signature]

**ARSAC SPAS/LAMP MOU**

**EXHIBIT A**

Los Angeles Commitments and Obligations

**EXHIBIT B**

Description of LAMP

**EXHIBIT C**

Agreement Not to Litigate  
Donor List

**EXHIBIT D**

PTMA

**EXHIBIT E**

Dismissal

**EXHIBIT F**

Prior Settlement Gate Terms



R

# EXHIBIT A

## EXHIBIT A

## LOS ANGELES COMMITMENTS AND OBLIGATIONS

- I. **Interim North Airfield Safety Improvements Project ("I-NASIP")**
- A. Prior to initiating project level CEQA review or asking FAA for NEPA review of any LAX north airfield runway relocation alternatives, LAWA will publicly release a Final CEQA Environmental Impact Report, and request FAA for NEPA review, for an Interim North Airfield Safety Improvement Project ("I-NASIP") (which, for purposes of this Agreement, shall include, but not be limited to, the projects listed in Exhibit A, Attachment 1). LAWA will not tier the I-NASIP environmental review or any LAX north airfield runway relocation environmental reviews off of the SPAS EIR.
- B. If LAWA obtains all necessary approvals for an I-NASIP, LAWA will make good faith efforts to implement I-NASIP within three (3) years and operate I-NASIP improvements for at least three (3) years after the removal or decommissioning of Taxiways Y and Z as part of I-NASIP implementation (the "**Initial Operations Period**"). The Initial Operations Period is intended to allow LAWA time, prior to initiating project level CEQA review or asking FAA for NEPA review of any LAX north airfield runway relocation alternative, to (1) observe and make a record of the effectiveness of the I-NASIP improvements in addressing safety and efficiency objectives, and (2) develop updated airline fleet forecasts, particularly for Group V and Group VI aircraft, based on operations, aircraft orders, and aircraft options by airlines operating at LAX. If Taxiways Y and Z are not removed or decommissioned by January 1, 2021, the commencement of Initial Operations Period will be extended on a day to day basis; provided however, the Initial Operations Period will not extend beyond January 1, 2026 under any circumstances. However, if the Interim Operations Period has not commenced by January 1, 2023 because LAWA has not obtained all necessary approvals for an I-NASIP, LAWA's obligations to implement I-NASIP under this Section I.B shall terminate. Under all circumstances arising from this Section I.B, subject to compliance with the LAX Plan in effect at the time of LAWA's review of LAX north airfield runway relocation alternatives, LAWA will appropriately consider alternatives that exclude a centerline taxiway unless the FAA issues a mandate, not solely applicable to LAX, requiring centerline taxiways for safety reasons.

- C. Exhibit A Subsections I.A and I.B do not bar LAWA from participating in any FAA-initiated NEPA review of LAX north airfield alternatives or responding to any FAA request for Airport Layout Plan amendments for the LAX north airfield. Exhibit A Subsections I.A and I.B will not apply if: (1) the FAA Administrator makes a formal finding that immediate efforts to reconfigure the north runway are necessary to address safety concerns and provides written notice of the formal finding to the City; (2) the FAA mandates nationwide minimum runway separation safety standards that render the LAX north airfield runways non-compliant; or (3) the FAA determines that the I-NASIP is infeasible or not practicable or the FAA determines that the I-NASIP would contribute to a degradation of safety at LAX when compared to existing conditions.

## II. Gates.

- A. The Parties agree that the specific provisions of the Prior Settlement attached to this Agreement as Exhibit F (the "**Prior Settlement Gate Terms**"), and no others, will be incorporated by reference in this Agreement and, except as otherwise provided in the Agreement, will continue to be effective, but only as between ARSAC (the party to the previous agreement) and LAWA, until December 31, 2024, unless the provisions of this Exhibit A Section II.C, below, take effect before December 31, 2024, in which case the Prior Settlement Gate Terms shall at such time immediately terminate and have no further effect. The ARSAC Parties acknowledge and agree that the Prior Settlement has otherwise terminated and has no further effect and that in no event will the Prior Settlement Gate Terms continue to be in effect after December 31, 2024.
- B. LAWA may propose West Remote Gate Relocation Program to replace the eighteen (18) remote passenger gate areas that are currently available for regular use west of Taxiway AA at LAX (the "**West Remote Gates**") with new passenger gate facilities (the "**Relocated Gates**") in the PTMA. LAWA may decide to initiate the West Remote Gate Relocation Program through the issuance of one or a series of CEQA NOPs. The ARSAC Parties acknowledge and agree, individually and collectively, that the project description in such NOPs may include elements for the repurposing of some or all of the area where the West Remote Gates are located with aviation-related uses other than those related to the delivery to or retrieval of air cargo or the loading or unloading of commercial passenger flights. Until the Relocated Gates are available for use as passenger aircraft gates, LAWA may continue to operate the West Remote Gates and passenger aircraft gates at LAX located within the PTMA.

C. If LAWA issues one or more NOPs for the West Remote Gate Relocation Program prior to or on December 31, 2024, the following provisions will be effective from the time LAWA issues the last NOP for the West Remote Gate Relocation Program until December 31, 2030, when the provisions of this Exhibit A Section II.C. will terminate and have no further effect:

1. After the Relocated Gates become available for use as passenger aircraft gates, LAWA will only have the right to use the West Remote Gates as passenger aircraft gates in the following circumstances:
  - a. LAWA may use the West Remote Gates at any time (i) during cases of emergency as declared by LAWA's Executive Director or a duly authorized law enforcement official or (ii) during peak periods of passenger activity when LAWA needs operational flexibility, but LAWA may use the West Remote Gates for operational flexibility on no more than 30 calendar days in any given year.
  - b. LAWA may use the West Remote Gates at any time for general aviation flights, charter flights, presidential flights, military flights or any other unscheduled passenger activity at LAX.

LAWA will provide ARSAC with a semi-annual report of the actual use, if any, of the West Remote Gates after the Relocated Gates are available for use, including the types of operations, types of aircraft, frequency of use, and time of day and day of week for such operations.

2. LAWA will not bifurcate or double-park aircraft that are actively enplaning or deplaning passengers on passenger aircraft gates to create more passenger aircraft gates in the following terminals than provided below:

| Terminal                             | Maximum Gate Configuration |
|--------------------------------------|----------------------------|
| 1, 2 and 3                           | 40                         |
| 4, 5, 6 and 7, 8                     | 64                         |
| Tom Bradley International Terminal   | 19                         |
| Midfield Satellite Concourse Phase 1 | 12                         |

**EXHIBIT A**



3. LAWA will not seek to develop any new passenger gates facilities outside the PTMA through the termination date of this Section II.
- D. In implementing the West Remote Gate Relocation Program or otherwise developing gate facilities within the PTMA, LAWA may issue NOPs for proposed development of passenger aircraft gates within the PTMA in any phase or sequence that LAWA chooses in its sole discretion, and such development may include, but will not be not limited to, Midfield Satellite Concourse Phase 2, the northerly completion of the Tom Bradley International Terminal, a passenger terminal facility east of Terminal 1 and west of Sepulveda Boulevard ("Concourse 0"), a passenger terminal facility within an area south of Century Boulevard and West of Avion Drive ("Terminal 9"), and the relocation of up to ten (10) remote passenger aircraft gates currently available at the American Eagle Facility (as shown on Exhibit D to this Agreement); provided, however, that (i) LAWA will not issue NOPs for terminal facilities, taxiways or taxi lanes within the PTMA that would be designed solely to serve aircraft smaller than FAA Group III aircraft; and (ii) any NOP issued by LAWA for projects in the PTMA will include a definitive gate count for that project, and upon approval and completion of each such project, LAWA will not bifurcate or double park aircraft that are actively enplaning or deplaning passengers on any passenger aircraft gate developed pursuant to and as defined in such project approval.
- E. If the FAA requires LAWA to consider the development of additional passenger aircraft gates outside of the PTMA, LAWA will dynamically model airfield operations (using SIMMOD or an equivalent modeling tool as determined by LAWA in its sole discretion); calculate the extent to which such passenger aircraft gates contribute to unacceptable LAX airfield delays as defined in FAA Advisory Circular AC: 150/5060-5, as amended from time to time; report such results to the Board; and make such results available for public review and comment for no less than 90 days.

**III. Other LAWA Commitments**

- A. **Payment of \$400,000.** LAWA agrees to pay ARSAC \$400,000 upon the immediate dismissal of the SPAS CEQA Writ Action Appeal and withdrawal of ARSAC's Motion to Tax Costs. LAWA will make the payment of \$400,000 directly to an account or fund as directed by ARSAC's counsel of record (Chatten Brown & Carstens).

1. ARSAC will direct its legal counsel to reimburse ARSAC's donors and to pay Chatten Brown & Carstens, such reimbursement and payment to be solely for the firm's work regarding the SPAS EIR, (collectively the "SPAS Attorneys' Fees Refund") in amounts determined by ARSAC. ARSAC and its counsel will document all fees to be paid in a manner that provides LAWA the ability to verify that the amounts to be paid were actually paid or owed by ARSAC to ARSAC counsel solely for work regarding the SPAS EIR and for no other purpose. ARSAC agrees that none of the funds paid to ARSAC Counsel or the SPAS Attorneys' Fees Refund will ever be used directly or indirectly to fund any litigation against the City or LAWA for any matter or any reason of any kind.
2. ARSAC agrees that before providing any of the SPAS Attorneys' Fees Refund to any ARSAC donor, ARSAC will require such donor execute a legally binding "Agreement Not to Litigate" in the form attached to this Agreement as Exhibit C and will provide LAWA with an executed copy of that Agreement. All ARSAC donors eligible to receive any of the SPAS Attorneys' Fees Refund monies are identified in Exhibit C attached to this Agreement. The ARSAC Parties individually and collectively represent and warrant that Exhibit C correctly states the amount each identified person contributed to the payment of ARSAC's legal fees in connection with the SPAS Litigation. ARSAC will complete all donor refunds within thirty (30) days of execution of this Agreement.
3. ARSAC agrees that any portion of the SPAS Attorneys' Fees Refund not paid to ARSAC donors or paid to Chatten, Brown & Carstens within thirty (30) days from the date of execution of this Agreement will be held in escrow (the "Escrowed Funds") until the earlier of December 31, 2018 or the completion of the FAA's environmental review and approval of all of the LAMP projects. ARSAC will not ever use directly or indirectly any of the previously Escrowed Funds for litigation against the City or LAWA for any matter or reason of any kind. ARSAC may use the previously Escrowed Funds for any other legal purpose. ARSAC will track the usage of the previously Escrowed Funds until they have all been expended. Every six (6)

**EXHIBIT A**



months, ARSAC will provide LAWA with a written report showing the uses to which the previously Escrowed Funds have been put and the remaining balance of Escrowed Funds.

- B. Waiver of SPAS CEQA Writ Litigation Costs.** Upon dismissal of the SPAS Appeal and the ARSAC SPAS CEQA Writ Motion to Tax Costs, LOS ANGELES agrees to limit its SPAS CEQA Writ Litigation costs recovery from ARSAC to \$84,000. LOS ANGELES agrees not to seek the \$84,000 from ARSAC so long as ARSAC complies with all of its obligations under MOU Section II.A II.C and II.D, and will waive recovery of that \$84,000 as against ARSAC on the LAMP Statute of Limitations Date, provided ARSAC has fully complied with all of its obligations under MOU Section II.A, II.C, and II.D, as of the LAMP Statute of Limitations Date.
- C. Aviation Conference Attendance.** LAWA will reimburse the tuition and travel expenses of two (2) ARSAC representatives to attend the following two (2) conferences annually through 2021:

  - 1. UC Davis Aviation Noise and Air Quality Symposium
  - 2. ACI-North America Technical Committee Annual Conference

ARSAC specifically agrees that this opportunity is for reimbursement of no more than 2 conferences per year for 2 people over a period of five years, with the expiration of the opportunity occurring as of January 1, 2022. All reimbursements will be subject to and limited by the LAWA travel policies in effect at the time of travel.

- D. Prop O Park.** LAWA agrees that when it seeks a developer for the Northside Office, Research and Development site, LAWA will include in the request for proposals a requirement/expectation that the developer will contribute, subject to FAA approval, up to but not exceeding \$4.2 million for the development of active recreational uses on the surface of the area currently designated in the Northside Plan for the Bureau of Sanitation Storm Water Facility (The BOS Facility). The development of active recreational uses on the surface of that area is not anticipated to occur until after completion of the BOS Facility by BOS. In no



case will LAWA be responsible for construction or maintenance of the surface uses.

- E. **Carl E. Nielsen Youth Park Lease.** Prior to seeking BOAC approval, LAWA will request written concurrence from the FAA for a proposed lease extension to the current lease with Westchester Playa Del Rey Youth Foundation of the Carl E. Nielsen Youth Park through December 31, 2024. If such concurrence is not received prior to January 1, 2017, unless such date is extended by LAWA in its sole discretion, LAWA will seek BOAC and City Council approval of an extension to the current lease with Westchester Playa Del Rey Youth Foundation of the Carl E. Nielsen Youth Park through December 31, 2024, with an alternative rental rate as determined by the BOAC. The lease extension will allow for early termination by the Lessee if, at any time during the extended term of the lease, the Lessee finds the Board-adopted rate unaffordable.
  
- F. If FAA rejects a LAWA request for the commitments in Section III.D or Section III.E of this Exhibit A, then LAWA will notify ARSAC in writing within thirty (30) days of FAA's rejection and LAWA will meet and confer with ARSAC to (1) modify the commitment with the goal of meeting FAA requirements or (2) identify a substitute commitment for the one denied by the FAA. If LAWA determines it cannot change or identify a substitute for the rejected commitment(s), then LAWA will set aside funds for future FAA-approved Westchester community benefit initiative(s) in an amount equal to \$100,000 in lieu of each rejected commitment.
  
- G. **AQMD Monitoring Location.** LAWA will consult with the South Coast Air Quality Management District to identify a potential location for one additional AQMD air quality monitoring system requiring not more than 5000 square feet of land to be located on LAWA property east of Sepulveda Blvd. While LAWA will seek to identify and reserve space for this use, actual lease or license of the space will be subject to all city and other governmental approvals and all costs associated with placing and/or maintaining the station at that location will be the responsibility of the AQMD.
  
- H. **LAWA Representative.** LAWA will designate in writing one individual as the "LAWA Representative" authorized to speak or act on behalf of LAWA for all purposes under this Agreement and



will provide ARSAC with contact information for the designated LAWA Representative. The LAWA Representative will make good faith efforts to provide a response addressing requests for information within sixty (60) days of such requests.

**The Remainder Of This Page Intentionally Left Blank**

**Exhibit A  
Attachment 1  
Interim-North Airfield Safety Improvement Project (I-NASIP) Potential Scope**

I-NASIP is a project consisting of proposed LAX improvements LAWA determines provides the opportunity to promote increased safety and improved aircraft operating efficiency, which may include but not be limited to, the following.

- Between Runway 24R/6L and 24L/6R:
  - Install up to two new high-speed taxiways and potentially relocate the existing high-speed taxiways within the western 1/3<sup>rd</sup> of the north airfield runways
  - Install up to two new high-speed taxiways within the eastern 1/3<sup>rd</sup> of the north airfield runways
  - Remove or decommission existing Taxiways Y and Z
- South of Runway 24L/6R:
  - Install the Taxiway D extension west of Taxiway R, relocate facilities and activities necessary to complete this, and remove Taxiway E-17
  - Upgrade Taxiways D and E between Taxiway S to Taxilane D7
  - Install Taxiway D and E extension from Taxilane D7 to the east end of Runway 24L/6R, possibly including a hold pad, "penalty box", or bypass ramp area
- Complete the installation of Runway Status Lights (RWSL) on the north airfield
- Widen Runway 24L/6R to 200 feet and make other improvements to enhance the safety of Group VI aircraft take-offs and landings
- Install Final Approach Runway Occupancy Signal (FAROS) at ends of all north runways
- Assess options to remove, relocate, and mitigate commercial facilities and transportation activities south of Westchester Parkway presently in the Runway 6L/24R Runway Protection Zone (RPZ) and Runway Object Free Area (ROFA)



EXHIBIT B

**ATMP-PC038****LAMP Project Description Elements**

This exhibit broadly identifies the approximate conceptual nature, elements, scope, size and capacity of the Landside Access Modernization Program ("LAMP") for Los Angeles International Airport ("LAX"). LAWA is in the process of preparing an EIR which will include a definition of the LAMP Project in more detail. A Notice of Preparation for the LAMP Project EIR was issued on February 4, 2015, and a draft EIR is expected to be issued in the Fall of 2016. The parties acknowledge and agree that planning and implementation of the LAMP project will continue to evolve, which may result in some changes regarding the LAMP project elements. Such changes are included within the scope of this Exhibit B so long as they continue to perform substantially the same functions.<sup>1</sup>

| <b>PROJECT COMPONENT</b>               | <b>GENERAL LOCATION</b>   |
|--|---|
| APM System                             | The APM would extend approximately 2.25 miles generally from the western end of the CTA along Center Way to S. Sepulveda Boulevard and then onto W. Century Boulevard to Vicksburg Avenue. The APM would then turn north to W. 96th Street and east along W. 96th Street to the CONRAC. The APM also includes a Maintenance and Storage Facility.   |
| ITF West                               | The ITF West facility would be located generally in the area bound by W. 96th Street to the south, Airport Boulevard to the east, Westchester Parkway/W. Arbor Vitae Street to the north, and extend past Jenny Avenue to the west.   |
| ITF East                               | The ITF East facility would be located generally east of Aviation Boulevard between W. 96th and W. 98th Streets.  |
| CONRAC Facility                        | The CONRAC would be located west of I-405, north of W. Century Boulevard, east of Aviation Boulevard and south of W. Arbor Vitae Street.  |
| Roadway Improvements                   | A series of roadway improvements would occur generally in the areas of: <ul style="list-style-type: none"> <li>• S. Sepulveda Boulevard and W. Century Boulevard, just east of the CTA;</li> <li>• Areas east of the CTA, bound generally by W. Century Boulevard to the south, S. Sepulveda Boulevard to the west, the I-405 to the east and Westchester Parkway/W. Arbor Vitae Street to the north; and</li> <li>• Areas north of Imperial Highway east of Aviation Boulevard to 111th Street.</li> </ul> |
| Terminal Cores and Pedestrian Walkways | <ul style="list-style-type: none"> <li>• Passenger walkway systems connecting the APM stations to passenger terminals, parking garages, and ground transportation facilities</li> <li>• Modifications to existing passenger terminals and parking garages to support the APM walkway system connections, including vertical circulation (elevators, escalators, and stairs) cores to all garage levels and to the arrival, departure, and concourse levels at the terminals;</li> </ul>                     |

<sup>1</sup> The term "CTA" refers to the Central Terminal Area at LAX. The term "TBIT" refers to the Tom Bradley Terminal at LAX.

**ATMP-PC038****Automated People Mover and Associated Facilities**

| PROJECT COMPONENT                | DESCRIPTION   |
|----------------------------------|---|
| APM Guideway                     | <ul style="list-style-type: none"> <li>• The APM would operate 24 hours a day, 7 days a week</li> <li>• Free to passengers, employees and the public</li> <li>• Varying width guideway extending from the western area of the CTA to Manchester Square</li> <li>• The APM would include 6 stations, up to 5 cars per train</li> </ul> |
| West CTA Station                 | <ul style="list-style-type: none"> <li>• Located between existing parking garages P3 and P4, east of TBIT</li> </ul>  |
| West CTA Station Parking Garage  | <ul style="list-style-type: none"> <li>• Approximately 470 parking spaces</li> </ul>  |
| Center CTA Station               | <ul style="list-style-type: none"> <li>• Located north of the existing Central Utility Plant, south of parking garage P2A</li> </ul>  |
| East CTA Station                 | <ul style="list-style-type: none"> <li>• Located between existing parking garages P1 and P7</li> </ul>  |
| Pedestrian Walkways              | <ul style="list-style-type: none"> <li>• Connect APM stations to terminals and parking garages</li> </ul>   |
| Vertical Circulation Cores       | <ul style="list-style-type: none"> <li>• Located at the interface of each pedestrian walkway and terminal/parking garage</li> <li>• Can accommodate elevators, escalators, and stairs</li> </ul>  |
| Maintenance and Storage Facility | <ul style="list-style-type: none"> <li>• Facility to support the operations and maintenance of the APM operating system in Belford Square.</li> </ul>   |
| Traction Power Substations       | <ul style="list-style-type: none"> <li>• Three to 5 substations to provide power to the APM guideway and trains</li> <li>• Located in the general vicinity of the East CTA Station, ITF West, ITF East, and/or APM Maintenance and Storage Facility</li> </ul>  |

**ATMP-PC038****ITF West**

| <b>PROJECT COMPONENT</b> | <b>DESCRIPTION</b>  |
|--------------------------|---|
| APM Station              | <ul style="list-style-type: none"> <li>• A pedestrian walkway connects to the public parking garage</li> <li>• A vertical circulation core consisting of elevators, escalators, and egress stairs, would provide passengers access to the ground level</li> </ul> |
| Curb Space               | <ul style="list-style-type: none"> <li>• Provide areas where airport shuttles and private vehicles can transfer airport users to the APM system</li> </ul>  |
| Public Parking Garage    | <ul style="list-style-type: none"> <li>• Approximately 8,000 parking spaces</li> </ul>  |

**ITF East**

| <b>PROJECT COMPONENT</b>   | <b>DESCRIPTION</b>   |
|----------------------------|--|
| APM Station                | <ul style="list-style-type: none"> <li>• A pedestrian walkway connects to the public parking garage and to the CONRAC APM station</li> </ul>       |
| Curb Space                 | <ul style="list-style-type: none"> <li>• Areas where airport shuttles and private vehicles can transfer airport users to the APM system</li> </ul> |
| Short term layover parking | <ul style="list-style-type: none"> <li>• Located north of the proposed APM station</li> </ul>  |
| Parking Garage             | <ul style="list-style-type: none"> <li>• Approximately 8,300 parking spaces</li> </ul>   |
| AMC Station                | <ul style="list-style-type: none"> <li>• Connects to future AMC Metro station</li> </ul>   |

**ATMP-PC038****CONRAC**

| PROJECT COMPONENT                         | DESCRIPTION   |
|---|---|
| APM Station                               |   |
| CONRAC                                    |   |
| Customer Service Building                 | <ul style="list-style-type: none"> <li>• Area where customers pick up rental contracts</li> </ul>   |
| Rental Car Ready/Return Parking Area      | <ul style="list-style-type: none"> <li>• Area where public picks up and drops off vehicles</li> <li>• Approximately 8,000 parking spaces for rental car vehicles</li> </ul>                                 |
| Quick Turnaround Area (QTA)               | <ul style="list-style-type: none"> <li>• Two separate structures containing fueling, car wash and maintenance facilities.</li> </ul>  |
| Vehicle Storage Area                      | <ul style="list-style-type: none"> <li>• Approximately 10,000 overflow spaces; 2,200 spaces above the Idle Storage Area that can be used for employee parking if not used for rental car storage</li> </ul> |
| QTA Support and Additional Site Functions | <ul style="list-style-type: none"> <li>• Approximately 340 parking spaces</li> <li>• Houses equipment and systems to support operations of the QTA</li> </ul>   |
| Employee and Visitor Parking              | <ul style="list-style-type: none"> <li>• Approximately 1100 employee parking spaces and 100 visitor parking spaces</li> </ul>   |
| Bus Plaza                                 | <ul style="list-style-type: none"> <li>• Approximately 12 bus bays</li> </ul>   |

**ATMP-PC038****Major Roadway Improvements – Phase 1**

| ROADWAY                                  | APPROXIMATE LOCATION                                   |
|--|--|
| <b>New Roadways</b>                      |  |
| New 'A' St                               | Century Blvd to Westchester Pkwy/W. Arbor Vitae Street |
| New 'B' St                               | New 'A' St to Airport Blvd                             |
| New 'C' St                               | Imperial Hwy and W 111 <sup>th</sup> St                |
| New 'D' St                               | W. 96 <sup>th</sup> St to W. Arbor Vitae St            |
| New 98 <sup>th</sup> St                  | Bellanca Ave to La Cienega Blvd                        |
| New Concourse Way                        | Century Blvd to New 98 <sup>th</sup> St                |
| <b>Improvements to Existing Roadways</b> |  |
| Sepulveda Blvd                           | Sepulveda Tunnel to W. 96 <sup>th</sup> St             |
| Airport Blvd                             | W. 98 <sup>th</sup> St to West Arbor Vitae St          |
| West Arbor Vitae St                      | Airport Blvd to La Cienega Blvd                        |
| West 96 <sup>th</sup> St                 | Airport Blvd to Bellanca Ave                           |
| West 98 <sup>th</sup> St                 | New 'A' St to Bellanca Ave                             |
| Centuiy Blvd                             | New 'A' St. to Aviation Blvd                           |
| Aviation Blvd                            | Century Blvd to West Arbor Vitae St                    |
| La Cienega Blvd                          | Century Blvd to W. Arbor Vitae St                      |

**Major Roadway Improvements – Phase 2**

| IMPROVEMENTS TO EXISTING ROADWAYS   | APPROXIMATE LOCATION                             |
|---|--|
| S. Sepulveda Boulevard  | LAX Airport Tunnel to W. 96 <sup>th</sup> Street |
| Northbound S. Sepulveda Boulevard to eastbound W. Century Boulevard Ramp                        | N/A  |
| Westbound W. Century Boulevard  | New 'A' Street to World Way                      |
| Westbound W. Century Boulevard Viaduct to World Way   | N/A  |
| Eastbound World Way (Arrivals) to southbound S. Sepulveda Boulevard Ramp                        | N/A  |
| Eastbound World Way (Departures) to southbound S. Sepulveda Boulevard Ramp (join existing ramp) | N/A  |
| Eastbound World Way (Arrivals & Departures)   | W. Centuiy Boulevard and to New 'A' Street       |
| Eastbound World Way (Departures) to northbound S Sepulveda Boulevard Ramp                       | N/A  |



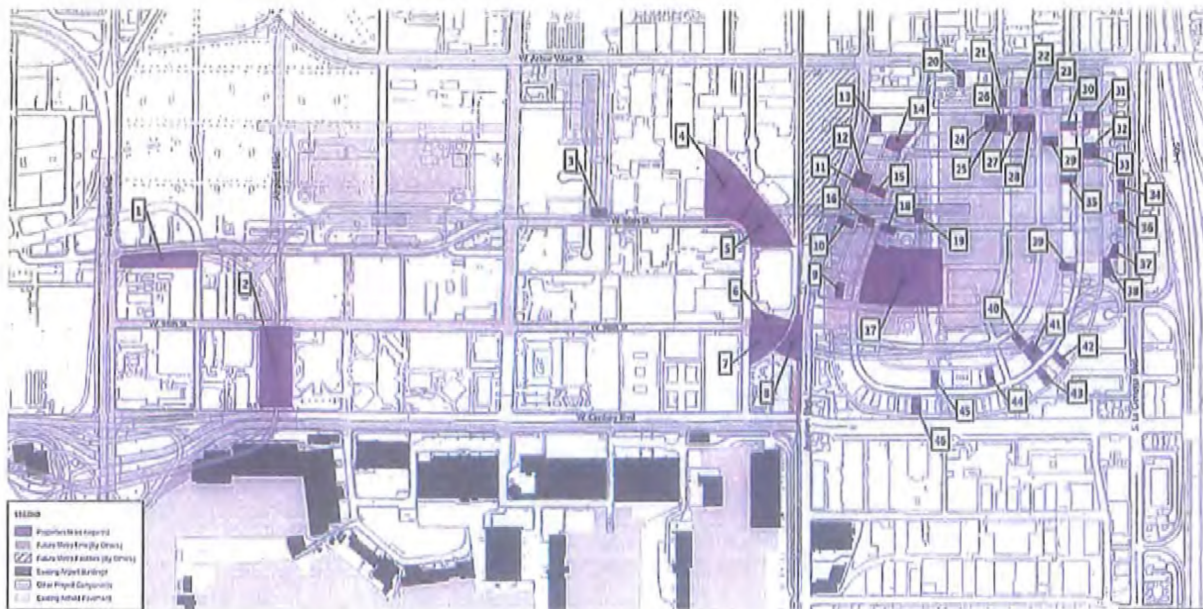
**ATMP-PC038****Other Project Components**

| Component                                   | Description  |
|---|--|
| Utilities                                   | <ul style="list-style-type: none"><li>• Utility improvements and relocations are required to support the construction and operation of the proposed Project facilities</li></ul>   |
| Operations (this list is not all inclusive) | <ul style="list-style-type: none"><li>• Policy changes may include, without limitation, changes to fees, pricing, licenses, traffic patterns, and agreements with various commercial vehicle operators at LAX</li><li>• Policy changes may include, without limitation, fees and prices imposed on the general public for roadway access and/or parking at LAX facilities</li><li>• Travel Demand Management (TDM) Program, Transportation Management Association; LAX-Area Employee Mobility Choice Program</li></ul> |
| Mitigation Measures                         | <ul style="list-style-type: none"><li>• At the end of the CEQA process, mitigation measures to reduce or eliminate significant impacts would be incorporated into the proposed Project.</li></ul>  |

# ATMP-PC038

## Acquisition Properties (may change during design and engineering)

In order to facilitate the construction of the LAMP Project, acquisition of several properties located along the APM, CONRAC, and roadways, including property right-of-way for curb cuts, and billboards, is required. LAWA will acquire the majority of these properties as part of the existing relocation program underway to mitigate aircraft noise impacts on area residences, as part of the LAWA's Aircraft Noise Mitigation Program (ANMP). Should the land acquisition under the existing ANMP Relocation Plan not be completed by the time the proposed Project is approved and advanced into implementation, LAWA would begin to explore practical measures, including voluntary acquisition, leasing, and/or eminent domain to ensure designated areas are vacated consistent with LAMP's construction sequencing plan.



## Enabling Projects

It is expected that construction of the LAMP project would require demolition of several existing facilities, some of which would be reconstructed. These enabling projects include but are not limited to three parking garages within the CTA that would be demolished and reconstructed, including Parking Garage P2A, Parking Garage P2B and Parking Garage P5. The Clifton Moore Administration Building would be demolished and offices would be relocated. The Bob Hope Hollywood United Service Organizations would be demolished and relocated. The restaurant building at 9601 Airport Boulevard would be demolished. The Metro Bus Terminal on 96<sup>th</sup> Street would be demolished and the facility would be relocated. Other properties scheduled for demolition include the Commercial Vehicle Holding lot on 98<sup>th</sup> Street, which would be demolished and relocated. The Delta Hangar complex would be demolished and relocated as would the Reliant Medical Center and the DEA offices. These enabling projects would also include various roadway work and utility relocations in the general vicinity of the Project.

**ATMP-PC038****LAMP Entitlements**

As part of the LAMP Project, LAWA will amend the LAX Plan, LAX Specific Plan, Westchester-Playa del Rey Community Plan, Mobility Plan 2035, and seek various entitlements including zone changes, tract maps and ultimately modify LAWA's Ground Transportation Permit Program. The LAX Plan Amendments include but are not limited to map amendments, text updates to LAMP components, goals and objectives, land use descriptions, updates to various policies and will remove specific projects. The LAX Specific Plan Amendments include but are not limited to general clean up and reorganization, clearer definitions of Project, addition of land use areas, modification of boundaries, inclusion of additional requirements, such as the LAX Design Guidelines, and removals of parking cap language specific to the build out of the 2004 Master Plan. LAWA will also seek amendments to the Westchester-Playa del Rey Community Plan, Mobility Plan 2035, and zone changes, tract maps and ultimately modify LAWA's Ground Transportation Permit Program to be consistent with and implement the LAMP Project.

**LAMP Phase 2: Potential Future Related Development**

| PARCEL NUMBER | APPROXIMATE SIZE<br>(ACRES) |
|---------------|-----------------------------|
| 1             | 4.5                         |
| 2             | 3.0                         |
| 3             | 2.5                         |
| 4             | 4.0                         |
| 5             | 2.5                         |
| 6             | 9.0                         |
| 7             | 11.0                        |
| 8             | 5.0                         |

**Potential Future Related Development – Potential Use**

| POTENTIAL USE                   | APPROXIMATE SIZE (SQ. FT.) |
|---------------------------------|----------------------------|
| Office Space                    | 300,000                    |
| Hotel (approximately 400 rooms) | 300,000                    |
| Commercial Space                | 200,000                    |
| Conference Center               | 100,000                    |
| <b>Total:</b>                   | <b>900,000</b>             |



EXHIBIT C

AGREEMENT NOT TO LITIGATE

The undersigned [NAME OF DONOR] (the "Donor") hereby acknowledges that:

1. S/he has read and understands the Memorandum of Understanding between ARSAC and the City of Los Angeles (the "City") dated \_\_\_\_\_, 2016 (the "MOU");
2. S/he has received reimbursement of \$\_\_\_\_\_ from the SPAS Attorneys' Fee Refund for donation(s) the Donor made to ARSAC to fund the legal expenses associated with the SPAS Litigation; and
3. In consideration of this reimbursement of donation(s) made by the Donor, the Donor agrees to be bound by the provisions of Section II.C of the MOU barring certain future litigation against the City.

Accordingly, the Donor covenants and agrees that s/he will not directly or indirectly commence, prosecute or fund any lawsuits or administrative complaints against the City, that could delay, prevent, impede, alter or affect in any way the approval or implementation of any project within LAMP (with the size and capacity shown in Exhibit B), I-NASIP, the West Remote Gate Relocation Program or the development of new passenger gate facilities within the PTMA, as all of these capitalized terms are defined in the MOU. The Donor further covenants and agrees that s/he will not directly or indirectly commence, prosecute or fund any lawsuits or administrative complaints, or intervene in any lawsuits or administrative proceedings, involving the environmental review or the approval by any local, state or federal agency of any project within LAMP, I-NASIP, the West Remote Gate Relocation Program or the development of new passenger gate facilities within the PTMA, as all of these capitalized terms are defined in the MOU. The Donor also acknowledges and agrees that this Agreement may be pleaded as a defense to any such litigation by the City or by any local, state or federal agency that is subject to a lawsuit, administrative complaint or intervention by any ARSAC Party with respect to the review, approval or implementation of any project within LAMP, I-NASIP, the West Remote Gate Relocation Program or the development of new passenger gate facilities within the PTMA, as all of these capitalized terms are defined in the MOU.

Dated: \_\_\_\_\_

\_\_\_\_\_  
[Name of Donor]



1. Ella Lewin, LLC - \$159,000
2. Dennis Schneider - \$80,000
3. Drollinger Family Charitable Foundation - \$25,000



EXHIBIT D

# Passenger Terminal Modernization Area

2

EXHIBIT D

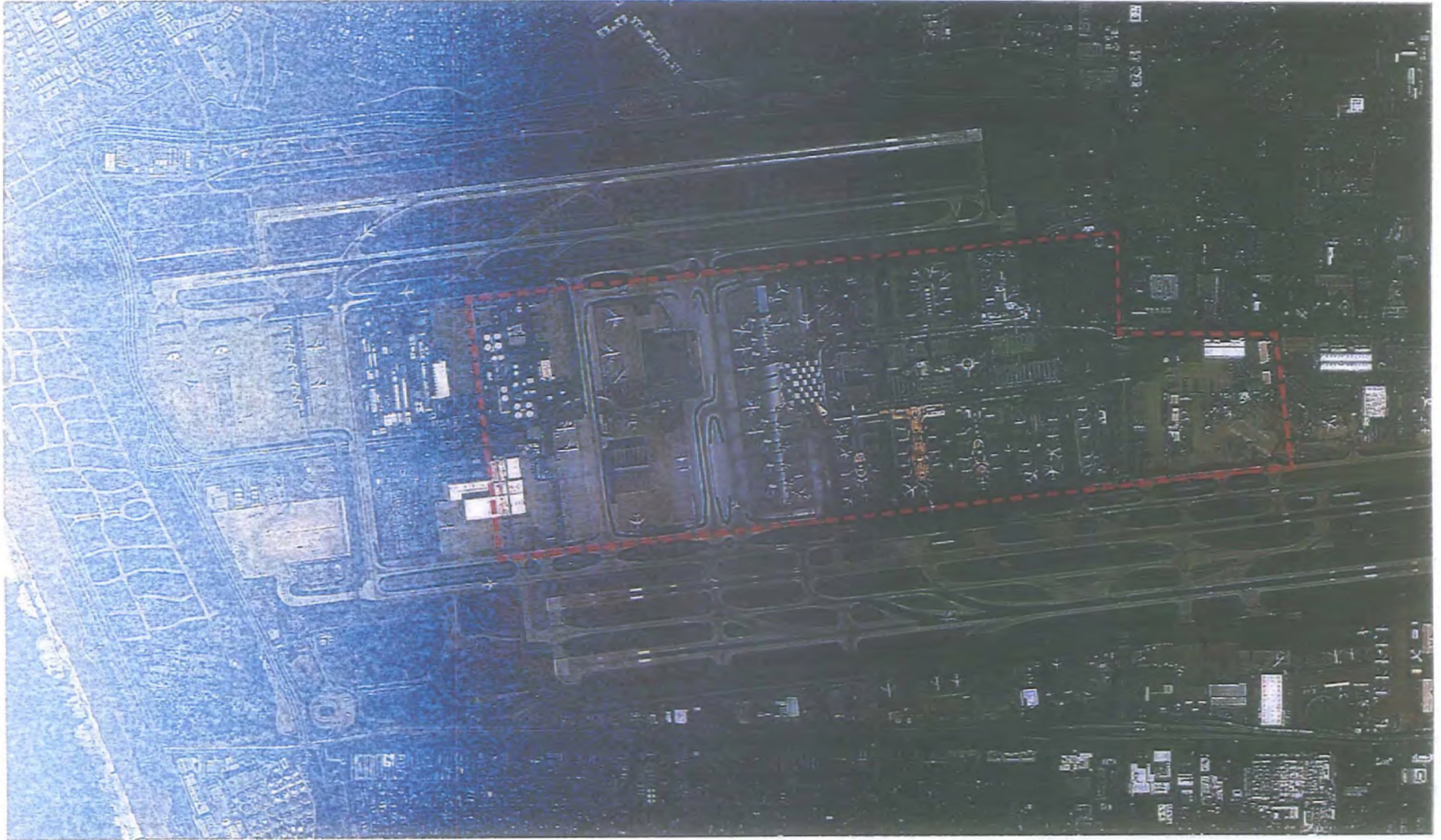




EXHIBIT E

|   |  |
|---|--|
| COURT OF APPEAL, <u>Second</u> APPELLATE DISTRICT, DIVISION <u>Six</u>  | Court of Appeal Case Number (if known):<br><b>B272457</b><br>Superior Court Case Number:<br><b>56-2014-00451038-CU-WM-OX</b> |
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address):<br>Douglas P. Carstens, (SBN 193439)<br>Chatten-Brown & Carstens<br>2200 Pacific Coast Hwy, Suite 318<br>Hermosa Beach, CA 90254<br>TELEPHONE NO.: (310) 798-2400 FAX NO. (Optional): (310) 798-2404<br>E-MAIL ADDRESS (Optional): DPC@cbcearthlaw.com<br>ATTORNEY FOR (Name): Alliance for a Regional Solution to Airport Congestion | FOR COURT USE ONLY   |
| APPELLANT: Alliance for a Regional Solution to Airport Congestion<br>RESPONDENT: City of Los Angeles, et al.  |  |
| <b>REQUEST FOR DISMISSAL OF APPEAL (CIVIL CASE)</b>   |  |

The undersigned appellant hereby requests that the appeal filed on (date) 05/24/2016 in the above entitled action be dismissed.

Date:

Douglas P. Carstens, Chatten-Brown & Carstens

(TYPE OR PRINT NAME)

(SIGNATURE OF APPELLANT OR ATTORNEY)

**NOTE: File this form in the Court of Appeal if the record on appeal has already been filed in the Court of Appeal. If the record has not yet been filed in the Court of Appeal, you cannot use this form; you must file an *Abandonment of Appeal (Unlimited Civil Case)* (form APP-005) in the superior court.**

**ATMP-PC038**



|  |                         |
|--|-------------------------|
| CASE NAME:<br>ARSAC v. City of Los Angeles, et al. | CASE NUMBER:<br>B272457 |
|--|-------------------------|

NOTICE TO PARTIES: A copy of this document must be mailed or personally delivered to the other party or parties to this appeal. A PARTY TO THE APPEAL MAY NOT PERFORM THE MAILING OR DELIVERY HIMSELF OR HERSELF. A person who is at least 18 years old and is not a party to this appeal must complete the information below and mail (by first-class mail, postage prepaid) or personally deliver the front and back of this document. When the front and back of this document have been completed and a copy mailed or personally delivered, the original may then be filed with the court.

**PROOF OF SERVICE**

Mail     Personal Service

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. My residence or business address is (*specify*):
  
3. I mailed or personally delivered a copy of the *Request for Dismissal of Appeal (Civil Case)* as follows (*complete either a or b*):
  - a.  **Mail.** I am a resident of or employed in the county where the mailing occurred.
    - (1) I enclosed a copy in an envelope and
      - (a)  deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.
      - (b)  placed the envelope for collection and mailing on the date and at the place shown in items below, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
    - (2) The envelope was addressed and mailed as follows:
      - (a) Name of person served:
      - (b) Address on envelope:
  
      - (c) Date of mailing:
      - (d) Place of mailing (*city and state*):
  - b.  **Personal delivery.** I personally delivered a copy as follows:
    - (1) Name of person served:
    - (2) Address where delivered:
  
    - (3) Date delivered:
    - (4) Time delivered:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

\_\_\_\_\_  
(TYPE OR PRINT NAME)

\_\_\_\_\_  
(SIGNATURE OF DECLARANT)

EXHIBIT F

## SECTION IV. PASSENGER GATE PROVISION

A. LAX currently has 163 total passenger aircraft gates available for loading and unloading of passengers during scheduled aircraft operations. Gates are defined as specific locations where passengers are embarked and disembarked. Except as provided in Subsection B.1 below, LAX will operate no more than 163 passenger gates at LAX throughout the term of this Settlement. As noted in the FAA's Record of Decision for the Proposed LAX Master Plan Improvements ("ROD") (May 20, 2005) on page 17, one objective of the LAX Master Plan is to improve the efficiency of passenger operations while also, "encouraging, but not requiring, other airports in the Los Angeles Basin to improve equally." According to the ROD "This is accomplished by restricting the overall availability of gates where passengers will board and exit an aircraft." The FAA's ROD lists a number of projects that comprise the LAX Master Plan and notes that these improvements will be implemented in phases. Appendix C of the ROD lists the proposed project phasing and notes that, "[t]he listing of these projects is not necessarily the order in which these projects may be implemented." The following minimum criteria will be used by LAX to implement the proposed LAX improvements in a timely manner in order to achieve the local and regional benefits described in the LAX Master Plan and in the ROD while also maintaining LAX's operational efficiency.

B. With respect to passenger gates at LAX, LAX will accomplish the following:

1. Having received the FAA's Statement regarding the effect of this provision on FAA's environmental obligations and matters under FAA's statutory authority, and consistent therewith, commencing in 2010, LAX will discontinue passenger operations at two narrow body equivalent gates ("NBEG") per year at LAX until LAX has discontinued passenger operations by a total of 10 NBEG. By December 31, 2015, the total number of passenger gates (including remote gates) shall be reduced to no more than 153 passenger gates. These reductions will be achieved through the build out of improved contact passenger gate facilities and the elimination of remote gate facilities as approved in FAA's ROD. Implementation of this Settlement will not restrict access at LAX to levels below those disclosed in FAA's Final EIS and ROD for the No Action and the approved project scenario in 2015.
2. If LAX discontinues passenger operations at any gate during the period of time before 2010, LAX shall receive an NBEG credit which may be used to offset any obligations to reduce NBEG at any time during this Settlement, and LAX shall also receive an NBEG credit for any annual NBEG reduction after 2009 in excess of two NBEG, such that LAX will not be required to reduce the existing number of NBEG by more than a total of 10 NBEG.

C. Subsection B.1 above shall not apply if either (1) total passenger operations at LAX are below 75 million annual passengers or (2) the LAX Master Plan Program is substantially revised pursuant to the LAX Specific Plan Amendment Process such that the total number of gates is reduced to 153 or less.

D. Subsection B.1 above shall not apply either (1) during states of emergency as declared by LAX's Executive Director or a duly authorized law enforcement official or (2) during peak periods of passenger activity when LAX needs operational flexibility to use additional gates, but under no circumstances shall LAX exceed the NBEG requirement of Subsection B on more than 30 calendar days per year for each peak period.

E. Subsection B.1 above shall not apply to general aviation flights, charter flights, presidential flights, cargo flights, military flights or any other unscheduled passenger activity at LAX.

F. LAX shall determine which combination of gates is to be operated at any given time, and shall, upon determining to change which gates are to be operated, notify Petitioners of such changes. No more than four times per year total, Petitioners shall have the right to conduct physical inspections at LAX to verify LAX compliance with this Section IV. Petitioners shall provide LAX with reasonable written notice of their intent to inspect, no less than 24 hours prior to the proposed inspection, to the office of the Deputy Executive Director of the Office of Quality and Compliance. LAX shall provide Petitioners' representative with the appropriate security clearance and on-airport transportation to conduct such physical inspections.

# Passenger Terminal Modernization Area



**ARSAC** *Alliance for a Regional Solution to Airport Congestion***ARSAC Comments and Questions on the ATMP DEIR pursuant to Section II of the ARSAC-LAWA MOU.**

The comments and questions below are pursuant to ARSAC's right to comment on the ATMP DEIR to help LAWA be more efficient in obtaining approval for the project. ARSAC considers itself within its right to point out failures by LAWA to comply with the 2016 ARSAC-LAWA MOU, the California Environmental Quality (CEQA), the National Environmental Protection Act (NEPA), the City of Los Angeles General Plan, LAX Plan, LAX Specific Plan and all other relevant laws, regulations and industry standards.

1. ARSAC-LAWA Memorandum of Understanding
2. Preamble
3. Introduction and Executive Summary
4. Project Description
5. Project Objectives
6. Air Quality
7. Historic Resources
8. Noise
9. Projected Future Baseline Conditions
10. Cumulative Impact
11. Mitigation Measures
12. Mobility Plan 2035
13. Alternatives
14. Alternatives Considered but Rejected
15. Appendix A Notice of Preparation/Scoping
16. Appendix B Activity Forecasts and Operational Analyses
17. Transportation (main document and Appendix G)
18. Appendix H Water Supply Assessment

**1. ARSAC-LAWA Memorandum of Understanding**

In 2016, ARSAC and LAWA negotiated a Memorandum of Understanding (MOU) to settle ARSAC's litigation over the LAX Specific Plan Amendment Study (SPAS). The MOU put in place key commitments and parameters for the various elements of the Airfield & Terminal Modernization Project:

1. Interim North Airfield Safety Improvement Program (I-NASIP)
2. West Remote Gate Relocation Program
3. Extension of the 153 gate cap to December 31, 2024 and additional gate development controls to December 31, 2030
4. AQMD Monitoring Station.

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LAWA also entered into commitments to pay for ARSAC's attendance at aviation conferences, funding for the Prop O Park on LAX Northside and lease extension of the Carl R. Nielsen Youth Park with the Westchester Playa Del Rey Youth Foundation and other commitments.

As stated before, ARSAC contends that LAWA has disregarded the provisions of the MOU in preparing the NOP and DEIR. The MOU provisions were to be the roadmap and guardrails for the ATMP. The legal questions concerning this matter are addressed in the attached letter by our attorneys, Chatten-Brown, Carstens & Minter.

**Questions:**

1. Did LAWA planning staff read the MOU? Why or why not?
2. Did LAWA planning staff consider incorporating the MOU requirements into the ATMP NOP? Why or why not?
3. When ARSAC asked in a meeting that LAWA invited to attend about the pre-NOP for the AMTP to reference the MOU, why did LAWA not reference the MOU into the NOP?
4. When ARSAC asked twice in writing (May 6, 2019 and July 30, 2019) to reference the MOU into the NOP for the ATMP EIR (CEQA) and ATMP EA (NEPA), why was that request not honored?
5. Did LAWA planning staff consider incorporating the MOU requirements into the ATMP DEIR? Why or why not?
6. When ARSAC raised MOU violations with LAWA beginning in October 2020, what was LAWA's response?
7. Will LAWA revise the DEIR to conform to the MOU? Will LAWA create new MOU compliant alternatives?

**2. Preamble**

Page 3 of PDF Preamble

"Therefore, this Draft EIR was well underway prior to the COVID-19 global pandemic, which emerged in early 2020."

Comment: This illustrates LAWA had enough details to do a Draft EIR but never contacted ARSAC to consult until just prior to release of DEIR.

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"Thus, the long-term forecasts developed for the proposed Project and documented in this Report are still valid and relevant for the long-term planning purposes of the LAX Airfield and Terminal Modernization Project environmental analyses."

Comment: Forecasts were based on unconstrained capabilities at LAX rather than what would be comfortable and practical here. If LAWA really agrees to modernization instead of expansion it will not accommodate



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projected growth ad infinitum and instead hold the line and help with modernization and regional distribution of aircraft operations.

U.S. Department of Transportation, Federal Aviation Administration, FAA Aerospace Forecast - Fiscal Years 2020-2040, March 2020, p. 64. Available: [https://www.faa.gov/data\\_research/aviation/aerospace\\_forecasts/media/FY2020-40\\_FAA\\_Aerospace\\_Forecast.pdf](https://www.faa.gov/data_research/aviation/aerospace_forecasts/media/FY2020-40_FAA_Aerospace_Forecast.pdf)

**3. Introduction and Executive Summary**

Page 31 of PDF “INTRODUCTION AND EXECUTIVE SUMMARY”

“A Notice of Preparation and Initial Study, included as Appendix A of this Draft EIR, was circulated for public review from April 4, 2019 to May 6, 2019.”

Comment: ARSAC was given one way communication presentation in 2018 on this but none of our questions were addressed. LAWA stated that they did not have answers but would give them when they were available. ARSAC was never consulted on project details discussed during the NOP or post NOP periods. A presentation of the project was provided three days before the Draft EIR Release and numerous questions were not answered as well as most NOP comments addressed nor answered.

Page 31 of PDF “As shown in Figure 1-1, the Project is located within the City of Los Angeles, at LAX on LAWA property. The Project 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. The proposed Project improvement sites are located within the northern and eastern portions of LAX (Figure 1-2). These sites consist of highly-developed land within and adjacent to a busy international airport. In the LAX vicinity, the community of Westchester is located to the north and , 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.”

**Comments and Questions:**

1. Does the 3,800 acres include Manchester Square and Northside Development areas acquired for noise mitigation?
2. Why are LA City areas within the current noise contour east of LAX not acknowledged?

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3. Why doesn't LAX equally note major roadway traffic access impacts on Vista del Mar, Pershing, Westchester Parkway, Manchester, La Tijera, La Cienega, Airport Blvd, Aviation, Florence, La Brea and many others which feed traffic into the CTA area and cargo areas?

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Page 31 of PDF “ The proposed Project consists of several primary elements, including airfield improvements that would enhance operational management and safety within the north airfield, new terminal facilities to upgrade passenger processing capabilities and enhance the passenger experience, and an improved system of roadways to better access the Central Terminal Area (CTA) and new facilities while reducing congestion.”

Comment: Bluntly states expansion of capacity.

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Page 33 of PDF Shows Figure 1-2 is a figure of the project location details in the LAX area.

Comment: Another equally detailed map should so the areas where gates are being placed to recognize that the ARSAC MOU agreement constraints are honored.

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Page 34 of PDR 1.1.3 Project Objectives

“The underlying purpose of the LAX Airfield and Terminal Modernization Project is to support the ongoing modernization of LAX, to provide excellent passenger service, to support the economic growth and prosperity of the Los Angeles region, and to work closely with neighboring communities to reduce airport-related impacts. The proposed Project would support the ongoing modernization of LAX by enhancing the safety and operational management of the airfield, particularly as related to runway exits; providing a new concourse and terminal to improve the quality of the passenger experience and efficiency of passenger processing; and improving the roadway system to better route airport-related traffic away from the public roads that serve the community. These improvements would help LAX to prepare early for the continued aviation growth that is projected by LAWA, the Southern California Association of Governments (SCAG), and the Federal Aviation Administration (FAA) to occur at LAX over the next several decades. Additionally, the nature and timing of improvements included in the proposed Project are integral to Los Angeles's plans to host the 2028 Olympic and Paralympic Games, with LAX serving as the main portal for athletes, dignitaries, and visitors from around the world.

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The Project objectives for the LAX Airfield and Terminal Modernization Project that support the underlying purpose are:

§ Airfield Improvements - Enhance the safety and operational management of the LAX airfield while working within the limits of the existing 4-runway system (i.e., do not add or relocate runways).

Specifically, the proposed airfield improvements seek to:

- Enhance safety of the north airfield complex
- Reconfigure north airfield taxiway and runway exits and intersections to meet current FAA design standards
- Maintain or enhance airfield operational management
- Provide additional flexibility for management of aircraft movements on the airfield

§ Terminal Improvements – Provide for new modern, spacious, and efficient terminal facilities that support the ability to accommodate the projected future growth in passenger levels at LAX and do so in a manner that offers high-quality passenger service and operational flexibility. For these reasons, this alternative was not carried forward for further analysis.

Comments and Questions:

1. How is LAWA reducing impacts on neighboring communities? It is certainly not working close with ARSAC.
2. What outreach and communication did LAWA have with the Neighborhood Council, local Business Improvement Districts and Chambers of Commerce?
3. The project objective of passenger efficiency is not defined. How many passengers per gate can be handled?
4. How many aircraft operations per runway can be handled now and will be after this project is completed
5. While we agree strongly with the safety objective, we are concerned that LAWA has not even incorporated any of the safety items promised in the ARSAC MOU. The draft talks about “projected future growth” which is not modernization but IS EXPANSION. Why wasn’t the runway 24L increased from 150’ to 200’ wide since this is recommended (but not required) by the FAA?

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Page 34 of PDF “Roadway System Improvements – In conjunction with providing landside (vehicle) access to the proposed new Terminal 9, develop a comprehensive network of roadway system improvements that will help separate and remove airport-related traffic from the local roadway system.

Specifically, the proposed roadway system improvements seek to:

- Reduce airport traffic back-ups onto public streets and surrounding neighborhoods, including, but not limited to, existing airport-related traffic congestion on Sepulveda Boulevard, especially near the entrance to the tunnel
- Integrate the proposed roadway system improvements, including landside access to Terminal 9, with the approved LAX Landside Access Modernization Program improvements
- Simplify driver wayfinding, reduce decision points, and provide more distance for maneuvering
- Reduce concentration of traffic and roadway facilities at and around the Century Boulevard/Sepulveda Boulevard/CTA interchange area
- Support access to the Intermodal Transportation Facility (ITF) West that is

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linked with the APM system, which will encourage use of those facilities and reduce vehicle miles traveled (VMT)

“ Develop an APM station to provide access to the future APM system for passengers and employees of the proposed Terminal 9, as well as other LAX passengers and employees (e.g., flight crews) that utilize hotel facilities nearby, which can help to reduce VMT

§ Additional Objectives

“ Generate business development, employment opportunities, and economic activity that draws from the local workforce and benefits the communities located around LAX and the City of Los Angeles

“ Maintain airport operations during construction

“ Implement airport improvements in a sustainable manner that considers the total cost of ownership, including financial, environmental, and social costs

“ Complete construction of the proposed Project prior to the 2028 Olympic and Paralympic Games to be held in Los Angeles

Comments and Questions:

1. Are all of these mitigation actions documented in the MMRP?
2. How much will be complete by the time the project is completed?
3. How will the results be measured?
4. ARSAC requests that LAWA maintain robust VMT monitoring until the permanent closure of LAX. If LAWA counts passengers, cargo, aircraft movements on a monthly basis and annual basis, then it can count cars, light trucks, heavy trucks and buses, etc.

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Page 35 of PDF

“Provide connections to adjacent terminals that will allow passengers to move between terminals without having to go back through security screening”

Comments and Questions:

1. While this is a good objective how will these people be conveyed or is it expected they will walk the long distances?
2. Since we’ve had several security breaches in the past of people moving between terminals how will this be addressed?

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Page 34 of pdf objectives ““ Improve passenger experience, increase airlines’ efficiency, and reduce busing activity on the airfield through the removal and replacement of most of the West Remote Gates and the elimination of the associated busing of passengers”

Comments and Questions:

1. The NOP for this project talked about relocating the western remote gates in consistency with the ARSAC-LAWA MOU. ARSAC was never consulted before this was changed to removing less than all 18 gates and was only mentioned three days prior to the draft EIR release.
2. What changed and when?

Page 35 of pdf Project objectives “Roadway System Improvements – In conjunction with providing landside (vehicle) access to the proposed new Terminal 9, develop a comprehensive network of roadway system improvements that will help separate and remove airport-related traffic from the local roadway system. Specifically, the proposed roadway system improvements seek to:

- “ Reduce airport traffic back-ups onto public streets and surrounding neighborhoods, including, but not limited to, existing airport-related traffic congestion on Sepulveda Boulevard, especially near the entrance to the tunnel
- “ Integrate the proposed roadway system improvements, including landside access to Terminal 9, with the approved LAX Landside Access Modernization Program improvements
- “ Simplify driver wayfinding, reduce decision points, and provide more distance for maneuvering
- “ Reduce concentration of traffic and roadway facilities at and around the Century Boulevard/Sepulveda Boulevard/CTA interchange area
- “ Support access to the Intermodal Transportation Facility (ITF) West that is linked with the APM system, which will encourage use of those facilities and reduce vehicle miles traveled (VMT)...”

Comments and Questions:

1. ARSAC was never consulted on details of the roadway improvements. When meeting with LAWA for the first time three days before release of the Draft EIR LAWA told us that details of roadways were not set and could not tell us how many lanes would be available in each roadway.
2. Since that was the case how did LAWA know how to evaluate the environmental impact from an unknown number of vehicles on each roadway?
3. ARSAC recommends that LAWA does not have any temporary access to Terminal 9 from northbound Sepulveda Boulevard coming out of the airfield tunnel. The tunnel routinely backs up with traffic and this proposed temporary Terminal 9 access will add to traffic congestion. The temporary access will also confuse drivers who should become accustomed to the final, proposed roadway configuration entrance by 96th Street and Sepulveda.

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Page 35 of pdf 1.1.4 Project Characteristics... Removal and replacement of 15 of the 18 West Remote Gates...”

Comments and Questions:

1. When was this condition changed from the NOP calling for removal and replacement of all 18 remote gates?
- 

Page 36 of pdf “...In addition, the Taxiway D extension would be designed to meet Airplane Design Group (ADG) Group VI separation standards from Taxiway E and the Vehicle Service Road, allowing ADG VI aircraft to use the Taxiway D extension instead of Taxiway E to avoid operational restrictions during ADG VI arrival and departure operations on Runway 6R–24L....”

Comments and Questions:

1. Although LAWA provided an existing Airport Layout Plan of the area after release of the draft details of the taxiway changes were not available to us.
  2. What width and separation is being implemented?
- 

Page 35 of pdf “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 zones, the new acute-angled exits would curve to provide 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....”

Comments and Questions:

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1. The ARSAC-LAWA MOU calls for completion of the safety elements such as Runway Status Lights (RWSL). There's no mention of this in the NOP and the DEIR is vague.
2. When is RWSL being added to the project plan and description?
3. When will RWSL be completed?

Page 36 of the pdf " Concourse 0 is planned as a concourse facility, with up to 11 narrow body aircraft gates that would attach to, and extend to the east of, Terminal 1. The new gates at Concourse 0, along with the new gates at Terminal 9, would serve to replace most of the existing West Remote Gates, as further described below. The two westernmost gates at Concourse 0 would replace the two easternmost existing gates at Terminal 1, resulting in a net increase of up to nine new narrow body gates.1 Concourse 0 would consist of up to seven levels, including four levels for the proposed concourse/passenger operations and potentially three additional levels of office space that LAWA is considering as an option. There would be a total floor area of up to 745,000 square feet for concourse/passenger operations, and potentially up to an additional 318,000 square feet of office space used for administrative purposes. Concourse 0 would serve both domestic and international flights. International operations would be supported with sterile2 circulation for international arrivals, a fully contained U.S. Customs and Border Protection (CBP) Federal Inspection Services (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 the future Terminal 1.5.

3 There would be no curbside access at Concourse 0

1 Concourse 0 could accommodate up to five widebody aircraft and three narrowbody aircraft, instead of 11 narrowbody aircraft, using the same gates and passenger boarding bridges available for 11 narrowbody aircraft; however, because the primary operator at Concourse 0 is expected to be Southwest Airlines, which currently only has narrowbody aircraft in its fleet, the primary use of the subject facility is anticipated to be for narrowbody aircraft.

2 "Sterile" areas are circulation (i.e., corridors) or holding areas that are restricted to cleared passengers. Sterile areas may be secured with access control solutions that include automatic alarms, closed-circuit television (CCTV) cameras, staffed personnel, and directional signage. CBP maintains sterility to prevent mixing of cleared and uncleared passengers, as well as the potential for contraband exchange.

3 Terminal 1.5 is a facility currently under construction west of Terminal 1 and east of Terminal 2. Terminal 1.5 will include passenger and baggage screening, ticketing, and baggage claim facilities in support of existing operations within Terminals 1 and 2; a secure passenger connection (i.e., enclosed/controlled corridor) between existing Terminals 1 and 2; and office and support space.

Comments and Questions:

1. Why call for only 15 instead of 18 West Remote Gates to be closed in the MOU?
2. When did Concourse 0 change from 4 to 6 gates to up to 11 gates?
3. The LAMP EIR proposed 660,000 square feet for Concourse 0. Why does the ATMP DEIR propose a dramatic size increase to over 1 million square feet?

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4. Southwest Airlines has utilized the narrow body Boeing 737 series almost exclusively in its fleet. The versatile 737 aircraft has given Southwest the ability to fly from the West Coast to the Hawaiian Islands and from the continuous United States to Mexico, Central America, and the Caribbean. Why would LAWA propose widebody gates for Concourse 0 when Southwest has not ordered or even rumored to have order widebody jets?
5. What is the likelihood that LAWA would allow other airlines to operate out of Concourse 0? The FAA requires US airports to produce “Airport Competition Plans”.
6. Will Concourse 0 be open to airlines other than Southwest as a part of LAX’s airport competition plan?

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P39 of pdf footnote: “ Terminal 9 is proposed to include a Multiple Aircraft Ramp System (MARS) to provide LAWA with the operational flexibility to serve multiple aircraft fleet-mixes over time. The gates at Terminal 9 could accommodate up to 12 wide-body aircraft, or up to 18 narrowbody aircraft, or various combinations thereof.”

Comments and Questions:

1. This is in direct conflict with MOU prohibiting bifurcation of gates.
2. Why has LAWA ignored the MOU?

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Page 39 of pdf Table 1 as below: Table 1-1

West Remote Gates and Passenger Gates with Implementation of Concourse 0 and Terminal 9 Location

| Existing Conditions | Future Conditions with Proposed Project | Remote Gates Contact Gates | Total Gates | Remote Gates | Net Change in Gates |
|---------------------|---|----------------------------|-------------|--------------|---------------------|
|---------------------|---|----------------------------|-------------|--------------|---------------------|

Source: LAWA, 2019.

Notes:

1 Passenger gates at Concourse 0 reflect net new gates. As described in Section 2.4.2.1, two of the new gates at Concourse

0 would replace two existing gates at Terminal 1 that would be removed as a result of Concourse 0.

2 As described in Section 2.4.2.1, Concourse 0 could accommodate up to 11 narrowbody aircraft or up to five widebody aircraft along with three narrowbody aircraft. As such, the number of net new gates, with the loss of two existing gates at Terminal 1, would be between six and nine.

3 As described in Section 2.4.2.2, Terminal 9 could accommodate up to 12 widebody aircraft or up to 18 narrowbody aircraft. As such, the number of new gates would be between 12 and 18.....

Similar to the descriptions above of Concourse 0 and Terminal 9, the existing West Remote Gates currently can be used by a combination of narrowbody and widebody aircraft, depending on needs at the time. The accounting



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of gates associated with Concourse 0, Terminal 9, and the West Remote Gates depends on their utilization by aircraft type, in terms of narrowbody aircraft or widebody aircraft, which can vary over time, even during the course of the day. The gate counts presented in Table 1-1 are based on the anticipated predominant use of the gates.

Comments and Questions:

1. Alternatives exceed MOU and ignore the no bifurcation rule.
2. Why is LAWA proposing 12 widebody or 18 narrow body gates for Terminal 9? If Terminal 9 is to be used for Star Alliance carriers, then most of the airlines are flying widebody aircraft to LAX. A narrow body aircraft gate be accommodated at a widebody gate.

Star Alliance carriers not serving LAX: Aegean Airlines (Greece), Air India, Brussels Airlines, Croatia Airlines, EgyptAir, Shenzhen Airlines, South African Airways (suspended operations), TAP Air Portugal and Thai Airways. In the late 1990s and early 2000s, LAX did have flights from Air India, TAP and Thai. These flights were withdrawn due to lack of profitability.

Star Alliance carriers serving LAX, including United Airlines international services:

| <b>Airline</b>            | <b>Origin/Destination</b>                     | <b>Aircraft</b>  | <b>Comment</b>  |
|---------------------------|---|--|---|
| <b>Air Canada</b>         | Vancouver, Calgary, Toronto, Montreal, Canada | Airbus A220, A320, A330; Boeing 737, 787 Dreamliner, and 777-300ER | US pre-cleared flights from Canada to US. Air Canada operates from Terminal 6.                |
| <b>Air China</b>          | Beijing, China PRC                            | Boeing 777-300ER   |   |
| <b>Air New Zealand</b>    | Auckland, New Zealand Rarotonga, Cook Islands | Boeing 777-300ER, 787 Dreamliner                                   | LAX-London Heathrow flight dropped in October 2020.   |
| <b>All Nippon Airways</b> | Tokyo-Narita and Tokyo-Haneda, Japan          | Boeing 777-300ER, Boeing 777-200ER                                 |   |
| <b>Asiana Airlines</b>    | Seoul, Republic of Korea (South)              | Airbus A380, A350XWB   | Korean Air announced acquisition of Asiana in November 2020. Asiana brand to be discontinued. |
| <b>Austrian Airlines</b>  | Vienna, Austria                               | Boeing 777-200ER   | Seasonal service from Terminal 6.   |
| <b>Avianca Airlines</b>   | Bogota, Colombia                              | Boeing 787   |   |
| <b>Avianca Costa Rica</b> | San José, Costa Rica                          | Airbus A320 series   | Star Alliance Affiliate; formerly LACSA   |

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| <b>Airline</b>                      | <b>Origin/Destination</b>          | <b>Aircraft</b>   | <b>Comment</b>  |
|-------------------------------------|------------------------------------|---|---|
| <b>Avianca El Salvador</b>          | San Salvador, El Salvador          | Airbus A320 series                                      | Star Alliance Affiliate; formerly TACA  |
| <b>Copa Airlines</b>                | Panama City, Panama                | Boeing 737 series                                       | Operates late at night at LAX (between 11:00pm and midnight)                                      |
| <b>Ethiopian Airlines</b>           | Addis Abba, Ethiopia<br>Lomé, Togo | Boeing 787  |   |
| <b>EVA Air</b>                      | Taipei, Republic of China (Taiwan) | Boeing 777-300ER  |   |
| <b>LOT Polish Airlines</b>          | Warsaw, Poland                     | Boeing 787  |   |
| <b>Lufthansa</b>                    | Frankfurt and Munich, Germany      | Airbus A380, A350; Boeing 747-400 and 747-8             | A380's currently parked due to COVID-19 pandemic may be phased out of fleet.                      |
| <b>Scandinavian Airlines</b>        | Copenhagen, Denmark                | Airbus A350   | Also known as "SAS". SAS pioneered the Polar Route from LAX to Europe in 1954.                    |
| <b>Singapore Airlines</b>           | Singapore<br>Tokyo-Narita, Japan   | Airbus A350-900 ULR, Boeing 777-300ER                   | The A350-900 ULR is used on the LAX-SIN non-stop, the second longest non-stop route in the world. |
| <b>Swiss International Airlines</b> | Zurich, Switzerland                | Boeing 777-300ER  |   |
| <b>Turkish Airlines</b>             | Istanbul, Turkey                   | Boeing 777-300ER  |   |
| <b>United Airlines</b>              | Various                            | Airbus A320, A321XLR and Boeing 737, 757, 767, 777, 787 | Airbus A350 orders deferred to 2027.  |

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Page 40 of pdf section 1.2 “Disagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among the experts.”

Comments and Questions:

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1. Where are the disagreements about project listed? This could include differences in the project definition as well but no such summary exists.
2. LAWA indicates it's in Chapter 1 of EIR ??? Where is it?

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Regarding page 1-22 Table 1-2 Summary of potential Impacts and mitigations Transportation States less than significant and no mitigations.

Comments and Questions:

We estimate that during this period at least 100,000 additional aircraft flights will occur into LAX based on LAWA and FAA projections without a true regionalization program in Southern California. We agree that the pollution from the aircraft can't be mitigated per se but the attendant ground traffic of 30 MAP should be significant in many ways—congestion for one, but also air quality impacts. ADDING 30 million annual passengers is like adding another significant sized airport at LAX- New York LaGuardia Airport (30 MAP in 2019)! There MUST be mitigations—not just in the CTA but in the areas of increased traffic originating as much as 10-30 miles for people going to-from LAX.

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**4. Project Description**

The Project Description appears to be unstable. The legal questions concerning this matter are addressed in the attached letter by our attorneys, Chatten-Brown, Carstens & Minter.

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Page 42 of EIR 1.3 Outline “Chapter 2 – Description of the Proposed Project”. Chapter 2 presents the location of the proposed Project, the objectives of the proposed Project, and a description of the elements, enabling projects, and construction schedule of the proposed Project. In addition, Chapter 2 identifies the intended use of the EIR and the approvals required for implementation of the proposed Project.”

Comments and Questions:

1. No single project description exists and it is never clear throughout the EIR. How many gates is it due to the MARS gate configuration?

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2. What is LAX passenger capacity with the various proposed gate configurations?

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ARSAC is concerned that the ATMP fails to include all possible airfield safety measures. ARSAC advocated for and LAWA implemented enhanced signage, runway and taxiway markings and improved lighting. It was through ARSAC's advocacy that the FAA approved the installation of Runway Status Lights (RWSL) at LAX. RWSL provides pilots a visual warning if it is safe to enter a runway. This low cost, high safety value technology has significantly reduced runway incursions at LAX. ARSAC had requested in the MOU and in many communications to LAWA that the Enhanced Final Approach Runway Occupancy Signal (eFAROS) be included in ATMP. It was not. Furthermore, ARSAC continues to advocate for a fully staffed air traffic control tower at LAX. ARSAC requests that LAWA lobby the FAA to provide adequate tower staffing so that controllers are not routinely working 6 days a week and overtime on a regular basis (pre-COVID-19).

Comments and Questions:

1. Why does the ATMP DEIR not relocate all 18 of the West Remote Gates to the Passenger Terminal Modernization Area (PMTA)? Reference MOU Page 2 Whereas clauses and Exhibit A, Section II, Paragraph B. LAWA's long term planning goal has been to remove the West Remote Gates. This commitment goes back to the approval of the LAX Master Plan Alternative D in 2004 and the FAA's Record of Decision of May 2005 that supports the relocation of the West Remote Gates, "Further, the remote gates on the west pad will be eliminated and this area will be prohibited from use as a remote passenger boarding location. See page 3-75 in Chapter 3 of Part I of the Final EIS."

[https://www.faa.gov/airports/environmental/records\\_decision/lax/media/rod\\_los\\_angeles.pdf](https://www.faa.gov/airports/environmental/records_decision/lax/media/rod_los_angeles.pdf)

2. When will LAWA relocate all 18 West Remote Gates to the PMTA?
3. LAWA claims it needs to retain West Remote Gates for operational efficiency and for Very Very Important VIP's (i.e. Air Force One). Isn't the purpose of eliminating the West Remote Gates because they are NOT efficient for passengers and the airlines? There are at least half a dozen other locations on the LAX airfield that could support the security needs of VVIP flights- why is LAWA not considering other locations?
4. ARSAC witnessed an Air Force Presidential fleet aircraft parked north of West Remote Gate 409 during a gate verification tour on February 24, 2021. When Air Force One or Air Force Two arrives at LAX, they are parked north of Gate 408 or 409 facing WEST. Presidential flights are serviced with stair trucks, not passenger boarding bridges. LAWA is proposing retaining Gates 410, 412 and 414 for "operational flexibility" and VVIP flights such as the President of the United States. These three gates have passenger boarding bridges and the aircraft face EAST. Did LAWA consult with the Secret Service

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on this proposal? The Secret Service requires a defensible perimeter and easy access to the runway in case that the President or Vice President of the United States needs to depart immediately.

5. Is the replacement of the West Remote Gates on a 1-to-1 basis into the PTMA as contemplated during the negotiation and approval of the MOU?
6. The MOU specifically prohibits bifurcation of gates or double-parking of aircraft at passenger gates until December 31, 2030. Why did LAWA propose Multi Apron Ramp System (MARS) gates for Concourse 0 and Terminal 9 when the MOU specifically prohibits MARS gates as a form of bifurcation/double parking? Reference MOU Exhibit A, Section II, Paragraph C, Sentence 2 and Paragraph D.
7. Why is the removal of Taxiway E-17 not included in the ATMP? The removal of Taxiway E-17 is noted in MOU Exhibit A, Attachment 1, “Interim North Airfield Safety Improvement Project (I-NASIP) Potential Scope” and is noted on the LAX Airport Layout Plan dated January 17, 2020 that LAWA had supplied to ARSAC this year.
8. Will the ATMP include a complete installation of Runway Status Lights on the LAX North Airfield? This is not clearly stated in the ATMP. When LAWA gave ARSAC a preview briefing of the ATMP DEIR on October 26, 2020, neither LAWA Chief Commercial Officer Samantha Bricker nor CDM Smith Consultant Tony Skidmore could answer this question. LAWA promised to provide an answer, but to date ARSAC has not received an answer. The MOU Exhibit A, Attachment 1 has “Complete the installation of Runway Status Lights (RWSL) on the North Airfield” listed.
9. Why is the installation of Final Approach Runway Occupancy Signal (FAROS) not included in the ATMP? FAROS is listed in the MOU Exhibit A, Attachment 1.

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## **5. Project Objectives (2.3.2)**

Page 35 of PDF

“Provide connections to adjacent terminals that will allow passengers to move between terminals without having to go back through security screening”

### Comments and Questions:

1. While this is a good objective how will these people be conveyed or is it expected they will walk the long distances?
  2. Since we’ve had several security breaches in the past of people moving between terminals how will this be addressed? Is there a security plan in place to shut down other connections in case of a breach?
-

**ARSAC** *Alliance for a Regional Solution to Airport Congestion*Additional Comments and Questions:

1. In DEIR Section 2.3.2.2, LAWA makes a goal of “Improve customs and immigration processes for international passengers at LAX.” Since the 1980’s the federal government has utilized overtime to make up for shortfall in Customs and Immigration staffing. Just because LAWA builds Federal Inspection Service (FIS) facilities does not mean that Customs and Border Control, Agriculture and Fish & Wildlife will show up. What commitments does LAWA have from these Federal agencies to provide adequate staffing for the existing FIS facilities at LAX (e.g. TBIT, Terminals 2, 4, 5 and 7) and the new, proposed ones at Concourse 0 and Terminal 9?
2. LAWA wants to have the LAX improvements completed prior to the 2028 Los Angeles Olympic and Paralympic Games. Has LAWA coordinated or offer to coordinate with the LA 2028 Olympic Committee to promote more than just LAX as the gateway to the Los Angeles region for the 2028 Olympics?
3. In preparing for the 2028 Olympics, did LAWA consider other airports such as the 17,750 acres of land in Palmdale to create additional airport capacity for the Olympics?

**6. Air Quality (4.2)**

Regarding air quality in Chapter 4 (page 4-3) Projected Future Conditions Baselines.

Comments and Questions: This topic is covered in the letter from our attorney. The notion that there will be runway closures impacting current years so that LAWA wants to use 2023 and 2024 because the traffic is less representative fails a reasonableness test. No one, including LAWA, can say with any certainty that there won’t be ground air traffic delays and issues in the new period so the “real“ baseline (which won’t have as much air traffic recovery) is a more reasonable basis to compare to future for the baseline.

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Regarding Page 4.1.1.-5 Section 4.1.1.1.2.2. Air Quality --Scope of Analysis, operations Along with 3.3.1 Air Quality (page 3-2) plus all of Appendix C

Comments and Questions: This analysis is not comprehensible by normal people. It shows objectives and then in the appendix is a list of hundreds of pages listing inputs to a model. Where in all of this information is the increase of vehicle pollution from the at least 30-50% increase in vehicles? From within ATMP Appendix C3 table there’s about 100 pages of inputs with traffic link columns for cars, trucks, etc. Within the hundred or more pages there is not a single light truck (i.e. SUV, PT Cruiser, etc.) in the mix?

**7. Cultural Resources (Historic Resources)**

**ARSAC** *Alliance for a Regional Solution to Airport Congestion*Comments and Questions:

1. The history of LAX on page 17 of Appendix D is missing that the City of Los Angeles acquired the Bennett Ranch land on October 1, 1937. There is a plaque commemorating this event on the ground floor of the Theme Building.
2. ARSAC appreciates that the four historic eligible buildings identified in the report will not be affected by the Project, especially the 1961 Air Traffic Control Tower which should be restored, the Union Savings and Loan Building and the Aircraft School Building.

**8. Noise (4.7)**Comments and Questions:

1. Not all of the eligible homes in the 65dB or higher contour in Westchester/Playa del Rey participated in the Residential Soundproofing Program between 1997 and 2014. Some of these homes have changed ownership. Will these non-participating homes be included in a reopened Residential Soundproofing Program for Westchester/Playa del Rey. Will this happen? What is required to make this happen?
2. Will LAWA reopen residential soundproofing for other communities such as Inglewood? South Los Angeles? El Segundo? Unincorporated Los Angeles County areas such as Lennox?
3. ARSAC is very concerned with the proposed Remain Overnight (RON) parking spaces between Terminal 1 and Concourse 0. Will LAWA place restrictions in place as a mitigation measure?
  1. No aircraft under power to move to and from RON. Use of tug-and-tow only.
  2. No engine run-ups or testing.
  3. No use of Auxiliary Power Units (APU's). LAWA may make ground power and pre-conditioned air available here for aircraft cabin cleaning.
  4. No loading or unloading of passengers and/or cargo.
4. Low frequency noise. LAWA should study the sources of low frequency noise at LAX and the methods to reduce or eliminate low frequency noise.
5. Did LAWA include “go arounds” in studying aircraft noise at LAX? “Go arounds” are when aircraft coming in for a landing are not permitted to land and have to fly low over the airfield or the surrounding communities to rejoin the arrival route to the airport.
6. Do “go arounds” affect the noise contour? To what extent?

**9. Projected Future Baseline Conditions**

Regarding ground traffic in Chapter 4 (page 4-4) Projected Future Conditions Baselines

Comment: The argument that LAMP projects completion should be part of the baseline is equally fallacious. LAWA has projected dramatic benefits which at this time are not in the least demonstrated. We do, however,

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know that with or without LAMP there will be dramatic increases in the use of LAX and therefore using a “future baseline” is even more misleading than using current conditions. Please read the letter from our attorney with regard to the use of Future Baseline Conditions.

**10. Cumulative Impact (4.8.6)**

Regarding Evaluation of Cumulative Impacts (page 4-4)

Comments and Questions: LAWA has stated that only approved projects in the timeframe qualified as being included in the cumulative projects. So additional contemplated but not approved airport and non-airport projects should also be included if LAWA uses the its own logic to use a future baseline.

**11. Mitigation Measures**

ARSAC has raised these mitigation issues in the past and in NOP comment letters. We would like to see LAWA adopt some of these mitigation measures to resolve old and potential new problems that affect airport area residents. ARSAC requests that mitigation measures be implemented before a project element is completed, where feasible. Where LAWA cannot enact a mitigation on its own, LAWA should identify the appropriate City department or other agency and work with that department and agency to implement the mitigation:

**Neighborhood Protection Mitigations**

1. Neighborhood protection 1- LAWA sets up a parking lot on LAWA 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. This off-duty lot is a necessary mitigation measure to remove these vehicles from taking up customer parking in the Westchester Central Business District and the surrounding residential community. Perhaps a shuttle bus to the Westchester Central Business District, not necessarily operated by LAWA?
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. LAWA 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- LAWA will work with airlines and Metro in promoting mass transit to and from LAX.
6. Capacity cap- Extend a gate cap to 2050. LAWA must actively work with airlines to consider increasing service at underserved or unserved airports in the region that want additional or new airline service.



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7. Capacity conservation. When LAX exceeds 90 MAP, LAWA 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. LAWA 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.
9. Implement all roadway mitigations indicated by a complete traffic study of the magnitude done for SPAS.
10. Staging lot. Taxis are parked along the south side of Westchester Parkway between Jenny Street and Sepulveda Eastway. There are "Taxi only" parking signs in this area. As an additional mitigation measure to get airport traffic away from residential areas, LAWA needs to have a staging lot for taxis, limos, town cars, TNC's, shuttle vans and buses.
11. Employee parking. ARSAC is seeing people working at LAX parking on Sepulveda Eastway and other local streets and walking to Lots C and D to catch a shuttle van to the Central Terminal Area (CTA). LAWA needs to implement policies that deter this kind of behavior and encourage people working at LAX to park in a paid parking lot (public or private) or use public transportation to their employment at LAX.
12. TNC neighborhood pick up restrictions. As a mitigation measure for LAX area neighbors, LAWA needs to issue new regulations to taxis, limos, town cars, and especially TNC's to discourage the problem of people who do not live in Westchester, Playa del Rey, El Segundo and other airport adjacent neighborhoods, but park their car on a neighborhood street and then use a TNC to get to LAX in order to avoid paying for airport parking.
13. Noise restrictions for the proposed Remain Overnight (RON) between Terminal 1 and Concourse 0:
  1. No aircraft under power to move to and from RON. Use of tug-and-tow only.
  2. No engine run-ups or testing.
  3. No use of Auxiliary Power Units (APU's). LAWA may make ground power and pre-conditioned air available here for aircraft cabin cleaning.
  4. No loading or unloading of passengers and/or cargo.
14. Ongoing robust VMT monitoring to continue until the permanent closure of LAX. We are not advocating for closure of LAX; we are suggesting an end date so that the commitment is not a "forever" requirement.
15. FlyAway buses have access to the CTA after the ATMP is completed to ensure public use and convenience. Fares should be the same or less than comparable ground transport even if LAWA has to subsidize the service. Headways should be short. Long distance routes to places like Irvine are not viable. LAWA needs to do a better job to advertise and promote FlyAways to ensure higher ridership. Different forms of payment should be accepted (cash, debit card, credit card, prepaid vouchers).

**12. Mobility Plan 2035 (4.8.6.1.2)**

ARSAC is concerned about pedestrian, disabled, and bicyclist safety as a part of ATMP. The ATMP turns Sepulveda Southbound between Lincoln and Imperial Hwy into a free flowing road. Without crosswalks, bridges or tunnels for pedestrians, people in wheelchairs or motorized scooters and bicyclists to safely cross

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Sepulveda, we fear many possible deaths. This danger would be heightened if people were forced to flee the Central Terminal Area by foot, wheelchair, scooter, skateboard or bicycle. This looks like an Americans with Disabilities Act compliance situation.

Questions:

1. For pedestrian access and safety, will there be crosswalk, bridges or tunnels for pedestrians to cross Sepulveda at Lincoln Blvd? Sepulveda and 96th Street? Sepulveda and Century Blvd?

**13. Alternatives (Chapter 5)**

The proposed Project and alternatives do not comply with the MOU. The details are in the letter from our attorney.

Questions:

1. What will LAWA do to make the AMTP conform to the MOU?
2. Will LAWA propose additional MOU compliant alternatives before proceeding to a Final EIR?

**14. Alternatives Considered but Rejected**

LAWA presented a West Terminal as an alternative that it rejected in the ATMP DEIR. ARSAC thanks LAWA for recognizing that the communities surrounding LAX would oppose that proposal. Additionally, such a “straw man” proposal also goes against LAWA’s plans for passenger convenience and to remove passenger operations from the west end of the LAX airfield as stated in the LAX Master Plan Alternative D and FAA Record of Decision (May 20, 2005). Pursuant to the LAX Specific Plan, the LAWA Executive Director is supposed to write a report of how a project complies with the objectives of the LAX Plan. Objective 5 is, “Lead the effort to regionalize air service in Southern California by forging strategic partnerships that connect LAX and other regional airports.” LAWA has been failing in this objective for the past 10 years by marking it as “Not applicable” in the case of the Terminal 4 Modernization (September 3, 2020). Reference, “LAX Specific Plan Section 7 (Ordinance No. 176,346 as amended by Ordinance No.179,148 and Ordinance No. 182,542 and Ordinance No.184,348 and Ordinance No.185,164) mandates that the Executive Director makes recommendation regarding LAX Specific Plan Compliance for all projects (as defined in the LAX Specific Plan) to the Board of Airport Commissioners (BOAC) prior to construction and issuance of any grading permit, building permit, use of land permit, or initiation or construction of any project.”

Questions:

1. In previous EIR’s, LAWA had included a “regionalization” alternative of moving some or all operations to other LAWA owned airports such as Palmdale Regional Airport (PMD). Why was this not included?
2. Does LAWA has a written regionalization plan with a budget, goals and objectives? When and where are the regionalization plans presented? Who is in charge of LAWA’s regionalization plan? Name, title and contact information?

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3. Considering that the airline industry believes that the travel industry will begin to rebound in 2023 and Los Angeles is hosting the 2028 Olympic and ParaOlympic Games, why is LAWA not considering development of PMD to provide additional airport capacity for the 2028 Games?
4. LAWA purchased 17,750 acres of land in Palmdale for a future Palmdale Intercontinental Airport. The City of Los Angeles approved a PMD EIR and successfully defended the EIR from litigation in the 1970's. Will LAWA consider developing PMD on its own? In a Joint Powers Authority with the City of Palmdale?
5. Will LAWA consider transferring PMD land holdings to the Palmdale Airport Authority on the same commercial terms as LAWA did ONT to the Ontario International Airport Authority?

**15. Appendix A Notice of Preparation/Scoping**Comments and Questions:

1. The 500 foot property radius is inadequate to inform the public of changes occurring at LAX. Projects at LAX are mega projects costing billions of public dollars and affect a wider area than just adjacent property owners. At least 2 mile radius should be used to notify property owners of proposed LAX projects.
2. ARSAC encourages LAWA to use the LAX Northside Project as model for community outreach for future LAX projects. The LAX Northside EIR faced no opposition as LAWA had met with the community before starting the EIR process and adopted community input into the LAX Northside Plan. Community stakeholders felt that they had a voice in the process and saw some of their ideas incorporated into the project. By taking a "working together" approach LAWA will resolve community concerns upfront in the project rather than the current unsatisfactory adversarial process.

**16. Appendix B Activity Forecasts and Operational Analyses**

The Constrained Forecast in Appendix B (Activity Forecasts and Operational Analyses) assumes in its SIMMOD computer simulations that future gate numbers and locations (pgs. 73-75) and project taxiways improvements (pgs. 89-90) would be adequate to accommodate the Constrained Forecast. Both the Unconstrained and Constrained forecast use a regression analysis based on historic socioeconomic factors in the Los Angeles Long Beach Combined Statistical Area (CSA) and LAX passenger and operational activity, from 2007 to 2017. The Constrained Forecast diverges from the Unconstrained Forecast after 2030, when an "acceptable" average annual delay per aircraft operation of 15 minutes is reached, according to the SIMMOD simulations. The basic problem with this methodology is that it has become largely irrelevant. The COVID pandemic has completely upended and disconnected correlations between LAX activity and socioeconomic variables, and has made activity trends since 2007 extraneous. Because of the pandemic from 2019 to 2020 passenger levels at LAX plunged by 51%, from 88 million air passengers (MAP) to 44.8 MAP. Moody's recently predicted that U.S. aviation activity won't fully recover until 2024 at the earliest, and probably years later after that. Both the Unconstrained and Constrained forecast show LAX at 100.3 MAP in 2024, which is completely unrealistic.

The Constrained Forecast assumes that airlines will adjust to increasing delays by using larger aircraft, increasing load factors and revising flight schedules. The legacy of COVID will likely be lower, not higher load

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factors in the future, so this assumption is specious. Instead of acquiring expensive larger aircraft, airlines will more likely raise air fares to maintain profit margins in the face of increasing airfield congestion, as well as shift flights to uncongested alternate airports on the region. Reference March 8, 2021, San Francisco Chronicle Article, “In California, airlines move to smaller airports, vacation routes”

<https://www.sfgate.com/travel/article/California-airports-vacation-destinations-SFO-16006333.php>

LAWA should go back to the drawing board to develop a much more accurate and credible Constrained Forecast for the ATMP EIR otherwise the EIR will be devoid of any realistic credibility. This includes a more realistic Unconstrained Forecast to reflect the reality of the current pandemic on current and future aviation demand, and more realistic assumptions about how airlines will likely react to increasing airfield congestion at LAX.

Comments and Question on Capacity (Appendix B, Sections 3.5 and 3.6):

The ATMP anticipates an increase from 2,013 flights per day in 2019 to over 2,253 flights per day in 2028. ARSAC is very concerned that neither the sky nor the LAX airfield can support over 2,200 flights per day. In the past 25 years, ARSAC has seen the effects of congestion at LAX, especially when LAX has approached 2,000 flights a day:

1. When the airfield is full, landing aircraft are forced to do a “go around” and fly low over the airfield and surrounding communities to rejoin the arrival flight pattern.
2. Airfield congestion at LAX results in the FAA placing gate holds on aircraft at originating airports. The authors of this comment have experienced gate holds at Oakland International Airport (OAK) and even as far away as Minneapolis/St Paul (MSP) when flying back to LAX. While gate holds delay flights, it does provide safety in that jets are not circling above their arrival airport running low on fuel. Gate holds also demonstrate air traffic control system limitations. Airlines control flight schedules; airports do not and the FAA rarely uses slot controls (e.g. Washington Reagan National, New York LaGuardia) to smooth out the number of flights.
3. Has LAWA factored in weather delays at other airports affecting LAX operations?
4. Has LAWA factored in air traffic capacity delays at other airports affecting LAX operations?
5. Did LAWA consider when NexGen Air Traffic Control would be fully in effect? Will NexGen make LAX takeoffs and landings more efficient or less efficient?

Corrections requested and questions:

Table 2-1 on Page 2-9 shows Passenger Gate totals in excess of the MOU Exhibit A, Section II Paragraph C, Sentence 2 Maximum Gate Configuration requirements. Terminal 4 to 8 total 66 gates when the maximum is 64. North MSC shows 15 gates when the maximum allowed under the MOU is 12. The West Remote Gates should go to zero.

Table 2-1 on page 2-9 may violate the 153 gate cap in effect through December 31, 2024 required by MOU Exhibit A, Section II, Paragraph A.

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Table 2-2 needs some updates and the 2018 DDFS and 2028 DDFS will also need to be updated to be accurate. LAWA should re-run with the 2018 DDFS and 2028 after it enters these corrections. The correct fleet is needed to provide more accurate data for the Noise and Air Quality sections of the CEQA EIR and the NEPA EA.

LAWA needs to consider the removal of certain aircraft types from the fleet for 2028: Boeing 747-400. Air France, British Airways and KLM have retired the 747-400 from their fleets. Careful analysis needs to be given to the Airbus A380 which airlines such as Air France have retired from their fleet. Other airlines likely to retain or bring back A380 service at LAX include British Airways, Emirates, Korean Air, Lufthansa and Qantas. Korean Air has acquired rival Asiana Airlines and those aircraft will be incorporated into the Korean Air fleet, possibly dropping the number of A380 flights at LAX.

Some airlines have used COVID-19 to rationalize their fleets much like the period after September 11, 2001. The airlines and these retired aircraft listed below should be removed from the 2028 DDFS.

“In 2020, Air Canada retired their entire Embraer 190 and Boeing 767-300ER fleets. The Embraer 190s were replaced by the Airbus A220 and Boeing 737 MAX 8, while the Boeing 767-300ER was replaced by the Airbus A330-300 and Boeing 787s.”

[https://en.wikipedia.org/wiki/Air\\_Canada\\_fleet](https://en.wikipedia.org/wiki/Air_Canada_fleet)

American Airlines retired in 2020 Airbus A330-200, A330-300; Boeing 757 and 767; and Embraer 190. Retired from the American Eagle regional fleet were Embraer 140 and Bombardier CRJ-200 aircraft.

<https://americanairlines.gcs-web.com/news-releases/news-release-details/american-airlines-reports-fourth-quarter-and-full-year-2020>

Delta Airlines retired in 2020 the McDonnell Douglas MD-80 series and MD-90 series as well as its Boeing 777 fleet (777-200LR and 777-300ER). In 2023, the Boeing 717 will be retired.

[https://en.wikipedia.org/wiki/Delta\\_Air\\_Lines\\_fleet](https://en.wikipedia.org/wiki/Delta_Air_Lines_fleet)

United Airlines will begin replacing its Boeing 757 fleet with the Airbus A321XLR in 2024. United will also add the Airbus A350 beginning in 2027.

[https://en.wikipedia.org/wiki/United\\_Airlines\\_fleet](https://en.wikipedia.org/wiki/United_Airlines_fleet)

For Terminal 2, the following corrections are needed:

XL Airways France is not listed. XL began flying to LAX in June 2016 and ceased operations on September 23, 2019. Was this airline and aircraft considered in the 2018 DDFS? This airline and aircraft should be excluded from the 2028 DDFS.

LAWA press release June 1, 2016, announcing XL Airways Airbus A330 flights 3 times a week to Paris, France from Terminal 2

<https://www.lawa.org/news-releases/2016/news-release-97>

XL Airways France shutdown September 23, 2019. Wikipedia article:

[https://en.wikipedia.org/wiki/XL\\_Airways\\_France](https://en.wikipedia.org/wiki/XL_Airways_France)

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For Terminal 6, the following corrections are needed:

Great Lakes Airlines ceased operations on March 26, 2018. This airline and its aircraft need to be excluded from the 2028 DDFS.

[https://en.wikipedia.org/wiki/Great\\_Lakes\\_Airlines](https://en.wikipedia.org/wiki/Great_Lakes_Airlines)

Virgin America was merged into Alaska Airlines on April 24, 2018. Alaska retained some of the Virgin America Airbus A320 series fleet. Was the Virgin America A321 fleet to be retained by Alaska Airlines considered in the 2028 DDFS?

[https://en.wikipedia.org/wiki/Virgin\\_America](https://en.wikipedia.org/wiki/Virgin_America)

[https://en.wikipedia.org/wiki/Alaska\\_Airlines#Fleet](https://en.wikipedia.org/wiki/Alaska_Airlines#Fleet)

Horizon Air is not listed. Horizon Air is a sister company to Alaska Airlines. Was the Horizon fleet considered in the 2018 DDFS and 2028 DDFS?

[https://en.wikipedia.org/wiki/Horizon\\_Air](https://en.wikipedia.org/wiki/Horizon_Air)

Viva Aerobus is not listed. Viva Aerobus began operations at LAX on December 12, 2017. Was the Viva Aerobus A320 fleet considered in the 2018 DDFS and 2028 DDFS?

<https://www.lawa.org/news-releases/2017/news-release-200>

For the Tom Bradley International Terminal, the following corrections are needed:

Aerolitoral, also known as Aeromexico Connect, is not listed. Aerolitoral is a subsidiary of Aeromexico. Was the Aerolitoral fleet considered in the 2018 DDFS and 2028 DDFS as a part of Aeromexico's fleet?

[https://en.wikipedia.org/wiki/Aerom%C3%A9xico\\_Connect](https://en.wikipedia.org/wiki/Aerom%C3%A9xico_Connect)

Air Berlin ceased operations on October 27, 2017. This airline and its Airbus A330 aircraft needs to be excluded from the 2018 DDFS and 2028 DDFS.

Wikipedia article:

[https://en.wikipedia.org/wiki/Air\\_Berlin](https://en.wikipedia.org/wiki/Air_Berlin)

Reuters October 27, 2017 article on the asset sales of the grounded Air Berlin:

<https://www.reuters.com/article/us-air-berlin-m-a-easyjet/easyjet-clinches-parts-of-air-berlin-for-german-expansion-idUKKBN1CW31C?edition-redirect=uk>

Asiana is being acquired by Korean Air and therefore Asiana will not exist in 2028. Asiana and its passenger and freighter aircraft needs to be excluded from the 2028 DDFS.

Wikipedia article:

[https://en.wikipedia.org/wiki/Asiana\\_Airlines](https://en.wikipedia.org/wiki/Asiana_Airlines)

Reuters November 15, 2020 article on Korean Air acquisition of Asiana Airlines:

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<https://www.reuters.com/article/us-asiana-airlines-m-a/korean-air-to-spend-1-6-billion-to-become-asiana-airlines-top-shareholder-idUSKBN27W04W>

Finnair is not listed. Finnair resumed flights from Helsinki to LAX on March 31, 2019. Finnair and its Airbus A350 should be added into the 2028 DDFS.

LAWA press release March 20, 2019 announcing Finnair service from Helsinki, Finland to LAX beginning March 31, 2019.

<https://www.lawa.org/news-releases/2019/news-release-21>

Interjet ceased operations on December 11, 2020. This airline and its Airbus A320 aircraft needs to be excluded from the 2028 DDFS.

<https://en.wikipedia.org/wiki/Interjet>

LOT Polish Airlines is not listed. LOT began service from Warsaw, Poland to LAX in April 2017. This airline and its Boeing 787 aircraft should be included in the 2018 DDFS and 2028 DDFS.

LAWA Press release October 1, 2016 announcing LOT Polish Airlines 4 times a week service beginning in April 2017:

<https://www.lawa.org/news-releases/2016/news-release-43>

Norwegian Air ceased all long haul flights on January 14, 2021. This airline and its Boeing 787 aircraft needs to be excluded from the 2028 DDFS.

[https://en.wikipedia.org/wiki/Norwegian\\_Air\\_Shuttle](https://en.wikipedia.org/wiki/Norwegian_Air_Shuttle)

“In January 2021, Norwegian and its subsidiaries began to reduce their fleets by handing several aircraft, including long-haul **Boeing 787s**, back to their respective lessors.<sup>[53]</sup> On 14 January 2021, Norwegian announced it was ending all long-haul services to focus on a resized European route network.<sup>[54][55]</sup>”

Scandinavian Airlines System is missing the letter “s” in Airlines.

[https://en.wikipedia.org/wiki/SAS\\_Group](https://en.wikipedia.org/wiki/SAS_Group)

Thomas Cook Airlines ceased operations on September 23, 2019. Which division of Thomas Cook was LAWA evaluating in this EIR? Was it Condor? Condor broke away from Thomas Cook and has resumed flight operations in Europe.

[https://en.wikipedia.org/wiki/Thomas\\_Cook\\_Group\\_Airlines](https://en.wikipedia.org/wiki/Thomas_Cook_Group_Airlines)

Turkish Airlines is misidentified as Turkish Airways

<https://www.turkishairlines.com>

WOW Airlines of Iceland ceased operations on March 28, 2019. This airline and Airbus A330 aircraft should be excluded from the 2028 DDFS.

[https://en.wikipedia.org/wiki/WOW\\_air](https://en.wikipedia.org/wiki/WOW_air)

**17. Transportation (Main document and Appendix G)**

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**OVERALL COMMENT ON TRANSPORTATION SECTION OF DEIR**

A tremendous quantity of data is presented in the ATMP DEIR in 65 pages in the main document and 748 pages in Appendix G. Unfortunately, there is very little actual information. An estimate of magnitude of transportation growth through 2028 in terms of VMT (Vehicle Miles Traveled) is presented without regard to whether the highway/street network has the capacity to deal with that growth.

**USE OF VMT**

The DEIR notes the state CEQA requirement for the use of VMT (Vehicle Miles Traveled). A critical consideration with respect to the DEIR is that translation from traffic counts, cell-phone information, etc., to VMT is done only at the final total gross level at the very end for both the employee category and the passenger category with no explanation of how that translation is done nor impacts along the timeline in between. The data for employees is presented as VMT per employee, but for passengers, not VMT per passenger.

The different presentations of employee VMT versus passenger VMT is misleading and disguises the large relative magnitude of employee VMT. In the following tables data are presented in VMT per category so direct comparisons can be made.

With respect to the passenger segment of the VMT, the basis for the calculations of VMT from passenger load is not specified. Also, there is no presentation of traffic growth versus MAP.

**TABLES OF VMT DATA**

| <b>TOTAL VMT</b>                    |                    |                                |                             |                 |
|-------------------------------------|--------------------|--------------------------------|-----------------------------|-----------------|
|                                     | 2018 Base/Existing | 2028 Projected without Project | 2028 Projected with Project | Incremental VMT |
| Employee*                           | 459,900,000        | 438,000,000                    | 479,792,500                 | 19,892,500      |
| Passenger                           | 6,581,811          | 8,676,209                      | 8,708,995                   | 2,127,184       |
| Total                               | 466,481,811        | 446,676,209                    | 488,501,495                 | 22,019,684      |
| % Passengers                        | 1.41%              | 1.94%                          | 1.78%                       |                 |
| *See Employee VMT Calculation Table |                    |                                |                             |                 |



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| <b>VMT Employee Calculation</b> |                    |                                |                             |
|---------------------------------|--------------------|--------------------------------|-----------------------------|
|                                 | 2018 Base/Existing | 2028 Projected without Project | 2028 Projected with Project |
| VMT per Employee                | 25.2               | 24                             | 23.9                        |
| Number of Employees             | 50,000             | 50,000                         | 55,000                      |
| Subtotal per Day                | 1,260,000          | 1,200,000                      | 1,314,500                   |
| Days per Year                   | 365                | 365                            | 365                         |
| Total per Year                  | 459,900,000        | 438,000,000                    | 479,792,500                 |

| <b>Daily Combined VMT</b> |           |
|---------------------------|-----------|
| 2018                      | 1,278,030 |
| 2028                      | 1,338,360 |

Although the VMT per Employee droppings from 25.2 in 2019 to 23.9 in 2028 due to mitigations is helpful, the 5.4% decrease could easily be negated by the fact that due to housing trends in the Los Angeles area, employees are likely on the average to move further away from LAX.

**INDUCED VMT**

Induced travel is a term used to describe how travel demand responds to roadway capacity expansion. The DEIR presents:

| <b>INDUCED VMT IN PROPOSED PROJECT – 2028</b> |        |
|---|--------|
| Short-term                                    | 3,306  |
| Long-term                                     | 18,220 |

**MITIGATIONS**

**MITIGATION MEASURES**

The DEIR lists both primary strategies and additional strategies. Primary Strategies include:

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- Expand LAWA’s Rideshare Program (projected increase in vanpool mode share for LAX employees of 7.9 percent)
- Formalize Employee Telecommuting Program (estimated to decrease over 7,000 daily employee VMT)
- Provide On-demand Micro-Transit Shuttle (estimated to decrease over 4,700 daily employee VMT)
- Market and Promote Alternative Transportation Options (opportunity; LAX does not currently engage in comprehensive marketing and promotions for alternative options to get to and from LAX using modes other than a private vehicle—details not specified)

Additional Strategies include: Conduct Parking Study to Price Parking to Reduce VMT, Expand Incentives and Commuter Benefits, Evaluate Modifications to FlyAway Service, Explore Incentive Measures from LAWA Mobility Strategic Plan, and Evaluate the Potential for Congestion Pricing in the CTA. No estimated of such mitigations were given.

**ANTICIPATED RESULTS OF MITIGATION**

Ability of Strategies to Mitigate Employment VMT Impact (with Project, 2018 to 2028 employee VMT reduced from 25.2 to 23.9 per day which is 71,500 per day for 55,000 employees, a reduction of 5.44%).

Ability of Strategies to Mitigate Passenger VMT Impact (estimated at 32,786 VMT per day).

Ability of Strategies to Mitigate Induced VMT Impact (induced travel is a term used to describe how travel demand responds to roadway capacity expansion). The DEIR states “... an induced demand elasticity factor of 1.0319 was applied to estimate long-term VMT, meaning that every percent increase in lane miles would result in a 1.03 percent increase in vehicle travel.” No potentially feasible mitigation measured was identified.

**Summary of Mitigation Results:**

**Daily Mitigation of VMT**

|                       |           |
|-----------------------|-----------|
| Mitigation Employees  | 71,500    |
| Mitigation Passengers | 32,786    |
|                       | 104,286   |
| Total Daily VMT       | 1,314,500 |
| % Estimated Decrease  | 7.93%     |

Note that in 2028 with the Project, employees generate 68.6% of the VMT reduction (71,500/104,286) while representing 98.2% of total VMT (479,792,500/488,501,495). As noted in the DEIR, Employee VMT is under more control of LAWA.

While there are transportation-related mitigations along the way, the lack of categorizations of VMT over the timeframe considered in the DEIR nor mitigations related to those categorizations is a key deficiency.

**ARSAC** *Alliance for a Regional Solution to Airport Congestion***INADEQUATE PRESENTATION OF MODELING**

The actual model underlying the calculations is never presented, only some vague references to VMT validation methodology in the Main ATMP DEIR document and section G.6 (e.g., page G.6-3) of Appendix G.

**DEIR ANALYSIS MISSES THE MARK: QUESTION OF WHETHER TRAFFIC CAN BE ACCOMMODATED WITH OR WITHOUT THE PROJECT**

The DEIR does not address the question of whether even without the proposed project whether the resultant traffic could be accommodated.

Note that the DEIR saying that project will add 5.8 lane miles increased length of travel in some cases (0.0062% increase) will not add parallelism needed for increased traffic capacity.

**PROBLEM A WITH DRAFT DEIR PROJECTION**

Noting that the employee VMT will only increase slightly (459,900,000 to 479,792,500) an increase of 4.3% and say is essentially flat and a constant in the analysis of increased ground traffic, traffic growth would be related to passenger VMT growth. The increase projected is 32.3%. While this increase is for a relatively small component of the overall VMT relative to Employee VMT, even now passenger-related traffic (particularly present during holidays) is problematic.

It is not clear how an increase of 32.5% can be accommodated (or in 2028 even without the Project).

**PROBLEM B WITH DRAFT DEIR PROJECTION**

The DEIR projects an increase from 2018 VMT total of 466,482,822 to 2028 VMT 488,501,495, an increase of 4.7%. Based on the ARSAC (Alliance for a Regional Solution to Airport Congestion) Ground Transportation Model presented to LAWA in the fall of 2017, the LAX data for CTA traffic showed an average annual increase in ground traffic from 2012 to 2016 of 6%. The average increase in MAP was 5.51%, roughly correlated with CTA traffic.

The projected MAP growth from 2018 to 2028 is projected from 84.5 to 110.8. This is an annual growth rate of 2.7%. Since the growth in ground traffic is roughly correlated to MAP, applying the 2.7% to ground traffic, the projected 2028 VMT would be 608,890,433 not the 488,501,495 projected in the DEIR model. This a 24.6% difference. In answer to a rebuttal that Employee VMT goes up slightly (459,900,000 to 479,792,500) an increase of 4.3%, the number of employees in the 2012-2016 likely did not change radically and yet the growth of ground traffic correlated with MAP. This is even more interesting because although the ARSAC model dealt with CTA traffic, the LAMP Intermodal Transfer Facility and CONRAC are replacement areas of concentration with the additional potential bottleneck of the APM.

It is not clear how a 2028 VMT of 608,890 can be accommodated (or in 2028 even without the Project).

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**18. Appendix H Water Supply Assessment**

Comments and Questions:

On page 2 of the March 5, 2020 letter to Los Angeles Department of Water & Power, LAWA proposes using ENERGY STAR certified residential dishwashers for water conservation.

1. Why is a residential dishwasher being used as a standard for a commercial environment such as LAX?  
Usually, restaurants will have commercial dishwashing equipment that can handle far greater volumes of plates, cups, glasses, utensils, etc. than a residential dishwasher.
2. Are there no ENERGY STAR rated commercial dishwashers available today?

**END OF COMMENTS**



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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](http://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

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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,



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President

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**ATTACHMENTS:**

Hotel RFI

Future fleet



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July 30, 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](http://www.lawa.org/atmp)

RE: Comments on Airport and Terminal Modernization Notice of Preparation (NOP) Environmental Assessment (EA)

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.

ARSAC appreciates the opportunity to comment on this EA NOP. We have attached our previous comment letter from the EIR NOP for this same project. Although the technical review criteria differ between an EIR and EA our comments are reflective of general lack of specificity and we encourage LAWA to provide more detail as a basis for the conditions reviewed.

We have additional comments:

1. We found discrepancies in the SPAS future fleet LAX projections. We proactively provided corrections so that they would not be promulgated into the new report. The old LAWA document was unrepresentative of the actual numbers of Boeing 767s (which is declining in service), included no Airbus A330s (which was operational at LAX then and now) and newly includes Boeing 717s which are now in use. Our data sources were Wikipedia.org and Airliners.net to verify aircraft types.
2. Off-duty parking lot. ARSAC continues to advocate for an off duty parking lot for taxis, limos, town cars, TNC's, shuttle vans and buses. This off duty lot is a necessary mitigation measure to remove these vehicles from taking up customer parking in the Westchester Central Business District and the surrounding residential community. Restrooms and a convenience store should be provided in the off duty parking lot. In addition, a shuttle service should be permitted to take off duty drivers between the off duty lot and the Westchester CBD.
3. Staging lot. Taxis are parked along the south side of Westchester Parkway between Jenny Street and Sepulveda Eastway. There are "Taxi only" parking signs in this area. As an additional mitigation measure to get airport traffic away from residential areas, LAWA needs to have a staging lot for taxis, limos, town cars, TNC's, shuttle vans and buses.

***ARSAC Alliance for a Regional Solution to Airport Congestion***

4. Employee parking. ARSAC is seeing people working at LAX parking on Sepulveda Eastway and other local streets and walking to Lots C and D to catch a shuttle van to the Central Terminal Area (CTA). LAWA needs to implement policies that deter this kind of behavior and encourage people working at LAX to park in a paid parking lot (public or private) or use public transportation to their employment at LAX.
5. TNC neighborhood pick up restrictions. As a mitigation measure for LAX area neighbors, LAWA needs to issue new regulations to taxis, limos, town cars, and especially TNC's to discourage the problem of people who do not live in Westchester, Playa del Rey, El Segundo and other airport adjacent neighborhoods, but park their car on a neighborhood street and then use a TNC to get to LAX in order to avoid paying for airport parking.
6. Public Participation for the Federal level EA. The notices to the public for input on the EA NOP appear to be limited in scope and only to areas very local to LAX. ARSAC found a notice about the NOP meeting on the OurLAX.org website. The NOP comment deadline was in this notice, but not seen elsewhere. Considering the cost and magnitude of this airfield and terminal modernization program and the effect it will have not just on local portions of Los Angeles County, one would have hoped that there would have been a much larger publicity effort on the part of LAWA to invite public participation and project comments. An immediate remedy to this would be for LAWA to extend the comment period by at least 30 days and undertake a much broader publicity effort than required by law.
  - a. What are the NEPA requirements for notification to the public using an EA?
  - b. Please list all of the notifications made for the airfield and terminal modernization project.
7. Although ARSAC has raised concerns about ability of emergency vehicle navigation on the congest roadways we are repeating this concern for emphasis.
8. LAWA appears to be projecting many additional planning efforts which are not fully approved. Although the detail requirement may not mandate including accommodations for all them, the magnitude of these future plans should be addressed so that the areas surrounding LAX and not inundated with additional impacts even before the subject constructions are completed.

We are happy to answer any questions or provide advice which we provide free of charge to LAWA.

Please contact us if you have any questions.

Sincerely,



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President

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Robert Acherman  
Vice President

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**ATTACHMENTS:**

May 6, 2019 ARSAC comment letter on Airfield and Terminal Modernization Program EIR.

CC: Doug Carstens, Chatten-Brown, Carstens and Minter, LLP

**From:** Paula Gerez <[paula.ncwpdr@gmail.com](mailto:paula.ncwpdr@gmail.com)>  
**Sent:** Tuesday, January 12, 2021 3:36 PM  
**To:** ERBACCI, JUSTIN <[JERBACCI@lawa.org](mailto:JERBACCI@lawa.org)>  
**Cc:** Geoff Thompson <[geoff.thompson@lacity.org](mailto:geoff.thompson@lacity.org)>; Chad Molnar <[chad.molnar@lacity.org](mailto:chad.molnar@lacity.org)>; Mike Bonin <[mike.bonin@lacity.org](mailto:mike.bonin@lacity.org)>  
**Subject:** Reference: Airfield & Terminal Modernization Project

Greetings Mr. Justin Erbacci,  
Please find our request for an additional 60-day extension for comments to the LAWA ATMP DEIR. The current deadline is February 12, 2020 and this requested extension would move the deadline to April 12, 2020.

I look forward to seeing you tomorrow for our meeting.  
Respectfully, Paula

**Paula Gerez**  
President, Neighborhood Council of Westchester Playa  
Block Captain, Neighborhood Watch

*Disclaimer and Privacy Statement: While I am a member of the Neighborhood Council of Westchester Playa, the foregoing may not represent the ratified position or views of the NCWP.*



## Neighborhood Council of Westchester Playa

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January 4, 2021

Mr. Justin Erbacci  
Chief Executive Officer  
Los Angeles World Airport  
P.O. Box 92216  
Los Angeles, California, 90009-2216

Reference: Airfield & Terminal Modernization Project

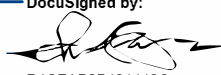
The Neighborhood Council of Westchester Playa would like to formally request an additional 60-day extension for comments to the LAWA ATMP DEIR. The current deadline is February 12, 2020 and this requested extension would move the deadline to April 12, 2020.

The complexity and size of the document (over 10,000 pages) warrants more time. The impact of the project on Air Quality, Greenhouse Gas Emissions, Noise and Transportation/Traffic will result in "Significant Unavoidable Impacts" and as such we have requested from the LADOT and the Planning Department help in reviewing the data.

We are awaiting input from the DOT and Planning and do not anticipate it in time for us to evaluate the input and make a timely recommendation to the Board in order to meet the current DEIR deadline of February 12, 2020.

Further, a non-CEQA review between LAWA and LADOT is in the works and may shed more light on potential additional mitigation strategies to reduce the project's negative impact on transportation traffic to the community.

Respectfully,

DocuSigned by:  
  
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Paula Gerez  
NCWP President

CC:

Ms. Evelyn Quintanilla, Los Angeles World Airports  
Councilmember Mike Bonin, [mike.bonin@lacity.org](mailto:mike.bonin@lacity.org)  
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**From:** [jordan@gideonlaw.net](mailto:jordan@gideonlaw.net) <[jordan@gideonlaw.net](mailto:jordan@gideonlaw.net)>  
**Sent:** Tuesday, January 12, 2021 12:04 PM  
**To:** QUINTANILLA, EVELYN Y. <[EQuintanilla@lawa.org](mailto:EQuintanilla@lawa.org)>  
**Subject:** ATMP DEIR: Missing CalEEMod Output Files

Ms. Quintanilla—It seems the Draft EIR is missing CalEEMod output files. For example, while it appears the Project relied upon CalEEMod for some aspects of the Project (e.g., energy demand associated with Terminal 9 parking [DEIR, p. 4.3-2]), only some of the CalEEMod assumptions are disclosed (e.g., land use type, size inputs, emissions estimates [Appendix C, PDF page 524])—and the CalEEMod output files are entirely missing. Hence, *I am requesting all CalEEMod output files relied upon in the Draft EIR.*

Please let me know if you have any questions regarding this request. Also, please confirm receipt of this message—many thanks.

-JRS

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