AECOM

Final Initial Study/ Negative Declaration and Responses to Comments
Los Angeles International Airport (LAX) Terminal 6 Renovation Project

LAWA
LOS ANGELES WORLD AIRPORTS

Prepared for:
Los Angeles World Airports (LAWA)

April 2020

Table of Contents

Section **Page**

LIST OF TABLES

Table **Page**

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SECTION 1
INTRODUCTION

1.1 OVERVIEW OF THE PROPOSED PROJECT

The City of Los Angeles, through the Los Angeles World Airports (LAWA) in its capacity as owner and operator of Los Angeles International Airport (LAX), proposes to implement the LAX Terminal 6 (T6) Renovation Project (the proposed project), which would improve the existing components of the Concourse in the T6 building and reconfigure or replace the associated aircraft parking apron, hydrant fuel, and gate systems within the confines of the existing T6 apron. The proposed improvements would enhance passenger experience, support safety and security through Transportation Security Administration (TSA) upgrades, support operational efficiency, improve building systems, and refresh portions of the terminal interior and exterior.

The proposed project has been designed in compliance with requirements set forth for capital projects as outlined in LAWA's Design and Construction Handbook, the design and planning requirements defined by Alaska Airlines, and in consultation with other airlines that currently operate at T6.

The proposed project includes improvements to the existing T6 Concourse. No improvements are proposed to the T6 Ticketing Building. The existing area and proposed areas of demolition, interior renovation, and addition are shown in Table 1. The proposed project would be implemented on three levels of the existing four-story T6 Concourse, as described below.

Table 1
Proposed Areas of Demolition, Interior Renovations, and Additions to T6 Concourse

Level	Area					
	Existing (SF)	Proposed Interior Renovation (SF)	Demo (SF)	Gross Add (SF)	Net Add (SF)	Proposed (SF)
1 - Arrivals Level	101,683	0	0	0	0	101,683
2 - OPS/Apron Level	180,978	0	-3,000	7,000	4,000	184,978
3 - Concourse Level	130,859	50,150	-6,000	24,000	18,000	148,859
4 - Lounge Level	14,326	5,260	0	3,000	3,000	17,326
Total	**427,846**	**55,410**	**-9,000**	**34,000**	**25,000**	**452,846**

1.2 CEQA ENVIRONMENTAL PROCESS

The California Environmental Quality Act (CEQA) applies to proposed projects initiated by, funded by, or requiring discretionary approvals from state or local government agencies. The proposed Project constitutes a project as defined by CEQA (California Public Resources Code Section 21000 et seq.). The CEQA Guidelines Section 15367 states that a lead agency is "the public agency which has the principal responsibility for carrying out or approving a project." Therefore, as an airport project with discretionary approval authority for the T6 Project, LAWA is the lead agency responsible for compliance with CEQA for the project.

As the lead agency, LAWA must complete an environmental review to determine if implementation of the project would result in significant adverse environmental impacts. To fulfill this purpose of CEQA, an Initial Study has been prepared to assist in such a determination. Based on the nature and scope of the proposed project and the evaluation included in the Initial Study environmental checklist, LAWA has concluded that a Negative Declaration (ND) is the proper level of environmental documentation for this project. The Initial Study shows that impacts caused by the proposed project have no impact or a less than significant impact. This conclusion is supported by CEQA Guidelines Section 15070, which states that an ND can be prepared when:

> *(a) the initial study shows that there is not substantial evidence, in light of the whole record before the agency, that the project may have a significant effect on the environment…*

1.2.1 ND and Notice of Intent

The draft IS/ND was circulated for public review from January 16, 2020 to February 5, 2020. The purpose of the public review period was to provide interested public agencies, organizations, and individuals the opportunity to comment on the contents and accuracy of the document.

A Notice of Intent (NOI) to Adopt a Negative Declaration was distributed to approximately 40 agencies, Native American tribal contacts, and community stakeholders, as well as approximately 6,100 property owners and residents. The NOI provided information on where the draft IS/ND could be reviewed and how to provide comments and was filed with the Los Angeles County Clerk and Los Angeles City Clerk. Copies of the draft IS/ND were made available to the public to review at the LAWA Administrative office (6053 Century Boulevard, Suite 1050), Playa Vista Public Library (6400 Playa Vista Drive), El Segundo Library (111 W. Mariposa Avenue), and the Westchester-Loyola Village Branch Library (7114 W. Manchester Avenue). A copy of the document was also posted online at: https://www.lawa.org/en/lawa-our-lax/environmental-documents/current-projects.

1.2.2 Errata to the Draft IS/ND

Revisions and clarifications made in response to changes necessitated by modifications to the proposed project are listed in the Errata to the IS/ND. Text which has been shown removed is shown with a ~~strikethrough~~ line, while text that has been added is shown as underlined.

Following the public review of the IS/ND, LAWA has made minor modifications or clarifications to the proposed project. In accordance with CEQA Guidelines Section 15073.5, the modifications and revisions to the proposed project and the environmental analysis in this Errata and Response to Comments on the IS/ND would not result in a requirement to recirculate the ND.

1.3 ORGANIZATION OF THE ERRATA, FINAL IS/ND AND RESPONSES TO COMMENTS

The final IS/ND is organized as follows:

Section 1 (Introduction) provides a summary of the proposed project and an overview of the CEQA environmental review process.

Section 2 (Errata to the Draft IS/ND) provides clarifications and minor modifications that were made to the final IS/ND. Clarifications and modifications reflect editorial changes made by the lead agency, and do not constitute significant new information and do not change any of the conclusions of the document.

Section 3 (Public Notices) provides a summary of the public notices that were published to notify the public and interested parties that a draft IS/ND was prepared for the proposed project.

Section 4 (Draft IS/ND) describes the draft IS/ND document that was prepared in accordance with CEQA.

Section 5 (Responses to Comments on the draft IS/ND) provides a list of agencies, organizations, and/or individuals commenting on the draft IS/ND, copies of the written comments received during the draft IS/ND public comment period, and the lead agency responses to those comments.

SECTION 2
ERRATA TO THE DRAFT IS/ND

The following clarifications and modifications are intended to update the draft IS/ND as a result of minor modifications to the description of the proposed project made by LAWA since the IS/ND was made available for public review. None of these changes to the IS/ND would require recirculation. Revisions made to the IS/ND have not resulted in new significant impacts that would require mitigation measures, nor has the severity of an impact increased. None of the CEQA criteria for recirculation have been met, and recirculation of the IS/ND is not warranted.

Text which has been removed is shown with a ~~strikethrough~~ line, while text that has been added is shown as underlined. Changes are listed by page number.

ND Page	Clarification/Revision
35-36	Construction of the proposed project is anticipated to begin in ~~March~~ 2020 and take approximately 36 months to complete, concluding in ~~February~~ 2023. Construction activities for Phase 1 are anticipated to take approximately 8 months, ~~occurring from approximately March 2020 to October 2020. Phase 1~~ and would require an average of approximately 103 construction workers per day; however, during peak construction, as many as 165 construction workers may be present.

Construction activities for Phase 2 are anticipated to take approximately 8 months, ~~occurring from approximately October 2020 to June 2021. Phase 2~~ and would require an average of approximately 132 construction workers per day; however, during peak construction as many as 186 construction workers may be present.

Construction activities for Phase 3 are anticipated to take approximately 6 months, ~~occurring from approximately June 2021 to December 2021. Phase 3~~ and would require an average of approximately86 construction workers per day; however, during peak construction as many as 103 construction workers may be present.

Construction activities for Phase 4 are anticipated to take approximately 6 months, ~~occurring from approximately December 2021 to June 2022. Phase~~ 4 and would require an average of approximately 145 construction workers per day; however, during peak construction as many as 186 construction workers may be present.

Construction activities for Phase 5 are anticipated to take approximately 4 months, ~~occurring from approximately June 2022 to October 2022. Phase 5~~ and would require an average of approximately 140 construction workers on a typical day; however, during peak construction as many as 165 construction workers may be present.

Construction activities for Phase 6 are anticipated to take approximately 4 months, ~~occurring from approximately October 2022 to February 2023. Phase 6~~ and would require an average of approximately 78 construction workers on a typical day; however, during peak construction, as many as 103 construction workers may be present.

SECTION 3
PUBLIC NOTICES

3.1 OVERVIEW

The NOI was published in the Los Angeles Times, Los Angeles Daily Breeze, and The Argonaut newspapers on January 16, 2020 to notify the public about the proposed project and disseminate information on how to submit comments as well as the deadline for submitting comments. The NOI is included on the following page.

NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION

Pursuant to the State of California Public Resources Code Article 6 of the California Environmental Quality Act (CEQA), as amended, the City of Los Angeles, through Los Angeles World Airports, has prepared an Initial Study for the project described below. Under CEQA, the City identified no significant impacts and proposes to adopt a Negative Declaration.

Date: January 16, 2020

To: All Interested Parties

Project Title: Los Angeles International Airport (LAX) Terminal 6 Renovation Project

Project Location: The project site encompasses LAX Terminal 6 (T6), including the associated concourse area and airside improvements within the confines of the existing T6 apron. It is located within the Central Terminal Area (CTA) of LAX, between Terminal 5 to the west and Terminal 7 to the east. LAX is situated within the City of Los Angeles, an incorporated city within Los Angeles County. The project site is in the southern portion of the CTA, west of Sepulveda Boulevard, south of World Way, and north of the South Airfield Complex. Related construction staging activities would occur elsewhere on other airport property.

Lead Agency: Los Angeles World Airports (LAWA)

Description of Project:

The City of Los Angeles, through LAWA in its capacity as owner and operator of LAX, proposes to implement the LAX T6 Renovation Project (the proposed project), which would improve the existing components of the Concourse in the T6 Building and reconfigure or replace the associated aircraft parking apron, hydrant fuel, and gate systems within the confines of the existing T6 apron. The proposed improvements would enhance passenger experience, support safety and security through Transportation Security Administration (TSA) upgrades, support operational efficiency, improve building systems, and refresh portions of the terminal interior and exterior. The proposed project would be implemented on three levels of the existing four-story T6 Concourse; no improvements are proposed to the T6 Ticketing area.

Public Review and Comment:

The proposed Initial Study/Negative Declaration for the proposed project will be available for a 20-day review period beginning on January 16, 2020, accessible online at www.lawa.org/en/lawa-our-lax, under "Environmental Documents, Documents Underway," and in print at the following locations:

LAWA Administrative Offices
6053 Century Blvd., Suite 1050
Los Angeles, CA 90045

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

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

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

Written comments must be submitted by no later than 5:00 p.m. Pacific Daylight Time on February 5, 2020, on the LAX website (www.lawa.org/en/lawa-our-lax, under "Submit a Comment") or by mail to:

Los Angeles World Airports
Attention: Kathline King
Environmental Programs Group
P.O. Box 92216
Los Angeles, CA 90009-2216

SECTION 4
DRAFT IS/ND

4.1 OVERVIEW

In accordance with CEQA, a draft IS/ND was prepared for the project as described in section 1.2. The IS/ND disclosed the project location, objectives, project description, permits and approvals required, operation, construction scenario, and the environmental impact assessment. The existing and proposed facilities were described in detail and project location maps were provided for context. Results of the environmental impact assessment were documented per the Initial Study checklist contained in Appendix G of the CEQA Guidelines.

SECTION 5
RESPONSES TO COMMENTS ON THE DRAFT IS/ND

5.1 OVERVIEW

The T6 Renovation Project draft IS/ND was distributed on January 16, 2020 for a 20-day public review period pursuant to CEQA and its implementing guidelines. The public review period concluded on February 5, 2020. The draft IS/ND was distributed to interested or involved public agencies, organizations, and individuals for review. During this public review period, a total of five comment letters were received. Each letter has been assigned a numerical code, and individual comments in each letter have also been coded to facilitate the responses. For example, the letter from the City of Inglewood is identified as Comment Letter 1, with comments noted as 1-1, 1-2, etc. Copies of each comment letter are provided prior to the response to each letter. Comments that raise issues not directly related to the substance of the environmental analysis in the draft IS/ND are noted, but, in accordance with CEQA, did not receive a detailed response.

5.2 RESPONSES TO WRITTEN COMMENTS THAT ADDRESS ENVIRONMENTAL ISSUES IN THE IS/ND

The written comment letters received on the draft IS/ND are listed in Table 2 below. The comments and associated responses are arranged by the date on which the comment letter was received. Each comment in the letters has been numbered and is referenced in the responses that directly follow the comment letter.

Table 2
List of Written Comment Letters Received in Response to the Draft IS/ND

Letter #	Agency/Organization/Individual	Date	Page # of Response
1	City of Inglewood, Economic and Community Development Department *Signed: Christopher E. Jackson, Sr.*	January 28, 2020	5
2	Los Angeles County, Department of Regional Planning *Signed: Bruce Durbin*	January 28, 2020	7

Table 2
List of Written Comment Letters Received in Response to the Draft IS/ND

Letter #	Agency/Organization/Individual	Date	Page # of Response
3	Jim Gerdes	February 3, 2020	9
4	Shute, Mihaly, & Weinberger LLP (City of El Segundo) *Signed: Benjamin Gonzalez*	February 5, 2019	60
5	California Department of Transportation, District 7* *Signed: Miya Edmonson*	January 31, 2020	65

* Comment was received after the close of the public review period but prior to issuance of the final IS/ND so is included for the record

Comment Letter No. 1

CITY OF INGLEWOOD

ECONOMIC AND COMMUNITY DEVELOPMENT DEPARTMENT

Planning Division

Inglewood All-America City 2009

Christopher E. Jackson, Sr.
Department Director

Mindy Wilcox, AICP
Planning Manager

January 28, 2020

Los Angeles World Airports
Kathline King
Environmental Programs Group
P.O. Box 92216
Los Angeles, California 90009 - 2216

RE: Notice of Intent to Adopt a Negative Declaration for the Los Angeles International Airport (LAX) Terminal 6 Renovation Project

Dear Ms. King,

Thank you for the opportunity to provide comments for the Notice of Intent to adopt a Negative Declaration for the Los Angeles International Airport (LAX) Terminal 6 Renovation Project. We have no initial comments at this time regarding the Notice of Preparation. However, we request that you continue to apprise us of all developments in the CEQA process for this project. 1-1

Should you have any questions please contact Senior Planner, Fred Jackson at (310) 412-5230. We look forward to reviewing the draft Environmental Impact Report and we appreciate the opportunity to provide input.

Sincerely,

Christopher E. Jackson, Sr.
Economic and Community Development Department Director

cc: Mindy Wilcox, AICP – Planning Manager
Fred Jackson – Senior Planner

One West Manchester Boulevard, 4th Floor, Inglewood, CA 90301/ Office: (310) 412-5230
www.cityofinglewood.org

Letter 1: City of Inglewood, Economic and Community Development Department

Response 1-1

The commenter states that they do not have any comments at this time but requests to be kept apprised of all CEQA developments for the project. The response to comments will be circulated to all commenters and published on the LAWA website at https://www.lawa.org/en/lawa-our-lax/environmental-documents/current-projects, where all project updates will be posted. No further response to this comment is required.

Comment Letter No. 2

COUNTY OF LOS ANGELES
AIRPORT LAND USE COMMISSION

January 28, 2020

Los Angeles World Airports
Environmental Programs Group
Attention: Kathline King
Post Office Box 92216
Los Angeles, CA 90009-2216

SUBJECT: INITIAL STUDY/NEGATIVE DECLARATION FOR LAX TERMINAL 6 RENOVATION PROJECT

Dear Ms. King,

Thank you for the opportunity to comment on the notice rearding the release of the Initial Study and Negative Declaration on the Terminal 6 renovation project at LAX for improvements of facilities in and around the Terminal 6 concourse. Staff of the Los Angeles County Airport Land Use Commission (ALUC) has the following comments:

> In December 1991, the Los Angeles County Regional Planning Commission in its capacity as the ALUC adopted the Airport Land Use Plan (ALUP) for the county's fifteen public use airports. For each airport the ALUC adopted planning boundaries, also known as the airport influence area (AIA), within which certain proposed local actions must be submitted to the ALUC for review. Staff has determined that the subject property is located within the AIA for LAX. 2-1
>
> However, the proposed project is an implementation of the LAX Plan and LAX Specific Plan or general airport improvement and is not a type of land use action which requires ALUC review as listed in Sections 1.5.1 and 1.5.2 of the ALUC Review Procedures and therefore does not require review by the ALUC for an Airport Land Use Plan consistency determination.

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

Sincerely,

DEPARTMENT OF REGIONAL PLANNING
Amy J. Bodek, AICP
Director

A. Bruce Durbin

Bruce Durbin, Supervising Regional Planner
Ordinance Studies Section/ALUC Staff
BD:as

320 West Temple Street, Los Angeles, California 90012 Telephone (213) 974-6409 or TDD (213) 617-2292 http://planning.lacounty.gov/aluc

Letter 2: Los Angeles County, Department of Regional Planning

Response 2-1

The commenter affirms that the subject property is located within the airport influence area (AIA) for LAX, for which locations must be submitted to the Airport Land Use Commission (ALUC) for review. However, the commenter then goes on to state that the proposed project is not a type of land use action which requires ALUC review. LAWA acknowledges that the project will not undergo ALUC review. No further response to this comment is required.

Comment Letter No. 3

From: Smartsheet Automation <automation@smartsheet.com>
Sent: Monday, February 3, 2020 12:18 PM
To: CRUZ, OHASSY C. <OCRUZ@lawa.org>
Subject: Addition to Our LAX Comment Form: Notification

Our LAX Comment Form (Prod)

Changes since 2/3/20 12:16 PM

1 row added

1 row added or updated (shown in yellow)

Row 47

Row ID	47
Full Name	Jim Gerdes
Company Name	Lenax
Email Address	jgerdes@lawa.org
Comments	Has there been any consideration for future planning in utilizing the existing center terminal parking for terminal expansion area such as check in and security which would open the current terminal areas to much more room, area and flexibility. It would all be connected to the outer terminal buildings by enclosure over/under the roadways. Especially when the people mover is completed, it would (I would think) open more flexibility (decreased demand?) for close vicinity parking. As tight as LAX is, compared to most other major airports, I would think it would be a viable idea.
Created	02/03/20 12:16 PM
Project	General Comment

3-1

Changes made by web-form@smartsheet.com

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

Your notifications include changes made by you. Exclude your changes from all notifications

Don't want to receive this notification? Unsubscribe

Letter 3: Jim Gerdes

Response 3-1

The commenter inquiries about utilizing the center terminal parking for terminal expansion to allow for more flexibility for close vicinity parking. This comment does not state a specific concern or question regarding the adequacy of the environmental impact analysis in the IS/ND. No further response to this comment is required.

Comment Letter No. 4

SHUTE, MIHALY & WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102
T: (415) 552-7272 F: (415) 552-5816
www.smwlaw.com

BENJAMIN GONZALEZ
Attorney
bgonzalez@smwlaw.com

February 5, 2020

Via E-Mail and Federal Express

Kathline King
Environmental Programs Group
Los Angeles World Airports
1 World Way
Los Angeles CA 90045
E-Mail: LAXstakeholderliaison@lawa.org

Re: LAX Terminal 6 Renovation Project Negative Declaration

Dear Ms. King:

On behalf of the City of El Segundo ("El Segundo"), we submit the following comments on the Initial Study/Negative Declaration for the Los Angeles International Airport ("LAX") Terminal 6 Renovation Project (the "Project"). As Los Angeles World Airports ("LAWA") is aware, El Segundo has been closely monitoring plans for, and implementation of, development at LAX, including this Project. El Segundo has already expressed its deep concern about LAWA's approach of assuming, without evidence, that renovating and expanding LAX facilities never influences growth in passenger traffic or aircraft operations—or the environmental impacts this growth would cause—because all future increases in travel are allegedly inevitable regardless of any physical changes to the airport. Not surprisingly, LAWA has again relied on this approach for this project, just as it relied on it for the LAX Midfield Satellite Concourse ("MSC") North and South Projects and the Terminals 2 and 3 Modernization Project ("T2/3 Project"). The public is also awaiting release of the draft environmental impact report ("EIR") for another project, the Airfield and Terminal Modernization Project ("ATMP"). Our comments on the notice of preparation ("NOP") for the ATMP emphasized the importance of LAWA acknowledging the substantial environmental impacts that would flow from adding gates at LAX as proposed. 4-1

According to LAWA, the Project's objectives, as described in the LAX Terminal 6 Renovation Project Initial Study/Negative Declaration ("Initial Study"), include remedying existing known deficiencies in levels of service and passenger experience,

operations, and building systems; improving airline operational efficiency with infrastructure for improved passenger movement; and accommodating existing and forecasted aircraft fleet models as well as supporting flight operations by realigning the existing 13 aircraft gates and 1 bus gate to accommodate 15 aircraft gates and a new bus gate. Initial Study at 19. The Project is estimated to take 36 months to construct and is separated into 6 phases to reduce operational interference. *Id.* at 35. This will cause a temporary closure of up to 3 gates at a time. *Id*. Operations and levels of service are projected to be maintained through use of temporary gates with ground boarding, and use of available gates in other terminals, the MSC, and remote gates and pads. *Id*.

Despite the increase in gates and the addition of a new bus gate, LAWA categorically denies that the Project could have *any* influence on the number of aircraft operations and passengers accommodated out of the airport. With this Project, like with the MSC and T2/3 Project, LAWA appears determined to avoid complying with the California Environmental Quality Act ("CEQA") by disowning any responsibility for the significant noise, air quality, climate change, and other environmental impacts of airport development, instead claiming that impacts from increased growth would occur anyway even with *current* facilities at LAX. For the reasons discussed herein, this approach is fundamentally flawed. 4-1 Cont'd

Thus, the Initial Study must analyze the full scope of the Project's environmental effects, including the impacts of increasing the total number of passenger gate positions, regardless of whether there is no net change to "terminal linear frontage" at Terminal 6. This letter explains El Segundo's concerns about the Project and identifies specific impacts that LAWA should evaluate as part of a full EIR for the Project. Under CEQA, if a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency must prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect. CEQA Guidelines § 15064 (f)(1) (citing *No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68).

I. LAWA Ignores the Environmental Impacts of the Increased Operations and Passenger Capacity Attributable to the Project.

The Project will include an addition of 2 new gates, bringing the total gates at Terminal 6 from 13 to 15. Initial Study at 33. Additionally, the Project will remove the current bus gate at Terminal 6 and replace it with a new bus gate that will allow for two buses to be staged at the gate concurrently, supporting use of buses to take passengers from Terminal 6 to international and domestic flights departing and arriving at remote gates. *Id.* at 23. Despite these improvements and additions of capacity to accommodate a 4-2

larger amount of operations and passengers, LAWA claims that the Project will not increase aircraft operations at LAX. *Id.* at 34-35. Instead, LAWA claims that the gate reconfiguration will accommodate existing and projected demand and the improvements at Terminal 6 will not induce additional operations. *Id*.

As such, LAWA claims that the environmental impacts of the Project will be less than significant, including air quality, noise, greenhouse gases, transportation, and cumulative impacts. El Segundo reiterates its position that this approach is fundamentally flawed. According to the Initial Study, LAX is forecast to have an annual compound growth rate of 1.78 percent from 2017-2045. *Id.* at 34. The fact that LAWA is investing substantial resources in multiple passenger gate expansion projects is proof that LAWA understands its current gates are not sufficient to meet potential demand. LAWA has the option not to expand the number of gates at LAX but has instead embarked on a substantial expansion effort and the Project is one component of that expansion effort. This becomes even more clear when the Project is viewed in the context of the many other expansion initiatives LAWA has recently advanced: MSC, T2/3 Project, and the ATMP. LAWA cannot reasonably claim that none of these projects drive growth at LAX and that impacts from increased growth would occur regardless, even with current facilities at LAX. LAWA is essentially relinquishing its responsibility to analyze the full scope of the Project's environmental effects, including the impacts of increasing the total number of passenger gate positions and bus ferrying capabilities.

4-2
Cont'd

A. LAWA Cannot Assume, Without Evidence, That Additional Passenger Gates and Bus Operations Will Not Increase Operations at LAX.

Even if future demand is predicted to increase despite any changes to LAX, LAWA cannot claim, without evidence, that additional gates will not contribute to an increase in operations at LAX. The current configuration of LAX is a limiting factor on the total operations that can occur at LAX. Even if there is a high demand for flights, the airport's ability to accommodate such a demand with existing facilities is not unlimited. By adding passenger facilities and increasing its level of service, LAWA will attract more passengers to, and facilitate more operations at, LAX.

The Initial Study provides no evidence that the addition of new passenger gates would not facilitate an increase in passenger operations. LAWA's rationale for why the Project will not contribute to new operations is as follows:

> [T]he passenger terminal apron areas would not increase in size as part of the proposed project, as the surrounding aircraft parking limit lines would remain in their existing location. Similarly, the available terminal linear frontage

> would not increase as part of the proposed project. *Therefore*, the reconfiguration proposed as part of the T6 Renovation project would *not increase aircraft operations* at LAX.

Id. at 34 (emphasis added). Thus, LAWA points to the claim that the Project would not increase "terminal linear frontage" as "evidence" that the Project would not allow increased operations.

CEQA, however, does not hinge on a lead agency's chosen metric for a project's physical footprint, but instead on whether the project will cause new *impacts*, including from enabling a more intensive use of current facilities. As El Segundo explained in its comments on the T2/3 Project Draft EIR (attached as Attachment 1), whether or not the Project would increase "terminal linear frontage" is not substantial evidence that the Project would not facilitate intensified operations, thus resulting in increased air quality, greenhouse gas, noise and other impacts. 4-2 Cont'd

As explained by Professor Adib Kanafani in Exhibit 1 to El Segundo's comments on the T2/3 Project Draft EIR, "simply to say" that adding new passenger gates would not cause or facilitate increases or decreases in operations and passenger volumes is not sufficient. Rather, LAWA must conduct a capacity analysis to *demonstrate* that re-gauging passenger gates to create additional gate positions would not result in increased capacity to handle aircraft operations or passenger flows.

B. LAWA's Description of the Project Undercuts Its Argument That Aircraft Operations at Terminal 6 Will Not Increase.

LAWA recognizes that the current gate configuration at Terminal 6 is inefficient and leads to use of the remote gates and pads when no gates are available, resulting in diminished levels of service and efficiency of aviation operations. Initial Study at 33. Having to bus passengers to and from the remote gates affects efficiency and levels of service because the remote gates lack passenger services, seating area, concessions and other amenities. *Id.* at 33-34. Despite acknowledging the lower level of service provided by the remote gates and pads, LAWA has not only redesigned the bus gate at Terminal 6, but has also increased the operational capabilities of the bus gate by allowing staging of two buses as opposed to a single bus as is currently the situation. 4-3

LAWA claims that the Project will reconfigure the gate positions and aircraft-parking layout around Terminal 6 to match existing and forecasted aircraft size requirements. Initial Study at 33. If we are to believe that there will be no increase in operations at Terminal 6 due to this reconfiguration, then why would LAWA need to

increase the ability to host more buses at Terminal 6? If the purpose is to increase operational efficiency and not increase overall operations, shouldn't the additional gates be sufficient to ensure a better level of service, resulting in less reliance on the remote gates?

The proposal to build a larger bus gate at Terminal 6 suggests that LAWA, despite repeated assurances that it will reduce use of the remote gates, has no intention of doing so and instead is looking to increase the total number of aircraft operations by increasing the number of aircraft parking positions *and* the ability to bus passengers to and from the remote gates. Thus, instead of increasing operational *efficiency*, LAWA is increasing operational *capacity* for Terminal 6.

LAWA therefore must analyze the increase in aircraft operations that would be enabled by the Project, and the environmental impacts of the increase in operations, including the cumulative operational impacts of the addition of other gates LAWA has indicated it plans to construct. Adding aircraft and bus gates will have the direct result of allowing LAX to support additional aircraft operations. For example, when describing the existing facilities, LAWA notes that on peak travel days, Terminal 6 hosts up to 113 daily departures and 111 daily arrivals, generating approximately 15,757 daily passenger departures and 15,527 daily passenger arrivals. Terminal 6 hosted a total of 8,318,827 international and domestic passengers in 2018. Initial Study at 16. However, LAWA makes no attempt at analyzing or quantifying how many more passengers and operations Terminal 6 will be able to host on a peak travel day with the increased gates and additional bus capacity. Without such a quantification, CEQA's purpose is subverted and the true impacts of the Project cannot be ascertained.

4-3 Cont'd

II. The Initial Study Ignores the Project's Cumulative Impacts.

The Initial Study must explain whether the Project would "have environmental effects that are individually limited, but cumulatively considerable" in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects. Yet, the only explanation as to why the Project's cumulative impacts would be "less than significant" is that the *Project*'s air quality, greenhouse gas, transportation, and noise impacts would not exceed thresholds of significance. Initial Study at 77. This is a not a legally sufficient analysis of the Project's impacts in connection with the effects of *past, current and future* projects. In fact, the Initial Study contains no discussion of past, current and future projects at all. As El Segundo also pointed out in its December 23, 2019 comments regarding LAWA's inadequate environmental impact analysis for the Midfield Satellite Concourse "South" Project, the Terminal 6 Renovation Project Initial Study does not mention the ATMP, for which a

4-4

draft EIR is expected to be circulated later this year. Under CEQA, the Terminal 6 Renovation Project must also be analyzed in light of the increase in passenger operations associated with the ATMP, which includes a combination of terminal and *runway* expansions. Thus, the ATMP will change operations airport-wide, including at Terminal 6. LAWA must study the Terminal 6 Renovation Project within this broader context.

This omission alone is grounds for a fair argument, based on substantial evidence, that the Project will have environmental impacts that are cumulatively considerable. "This lack of study . . . 'enlarge[s] the scope' of the fair argument which may be made 'based on the limited facts in the record.'" *Gentry v. City of Murrieta* (1995) 36 Cal.App.4th 1359, 1382, as modified on denial of reh'g (Aug. 17, 1995). As explained in Part I, the Project will have significant air quality, noise, greenhouse gas and other impacts based on the unanalyzed increase in passenger operations from the addition of new passenger gates and bus-gate operations at Terminal 6. Thus, "there [is] substantial evidence in the record to support a fair argument that the Project would have significant adverse effects . . . . [and] [t]he lack of evidence in the record to support a conclusion that the Project would have no cumulative effects thus tends to support a fair argument that … the Project *will have such effects*." *Id.*

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III. LAWA's Analysis of Noise, Greenhouse Gas, Air Quality, Traffic, and Cumulative Impacts Is Flawed Because It Does Not Include the Increased Operations Attributable to the Project.

The Initial Study's traffic, noise, greenhouse gas, air quality, traffic and cumulative analysis focus exclusively on how conditions would change as a result of the Project's construction. Initial Study at 46-49 [air quality]; 58-59 [greenhouse gas emissions]; 66-67 [noise];70-72 [traffic]; 76-77 [cumulative]. It fails to provide *any* analysis of the Project's operational impacts under the misguided assumption that the proposed Project would have no effect on passenger numbers and flight operations. As discussed above, this assumption is incorrect. The Project would improve passenger levels of service and therefore has the potential to increase passenger capacity and attract more passengers to LAX. Increased passenger capacity/activity will result in increased traffic to and from the airport and associated greenhouse gas, air quality, noise, and cumulative impacts. The effects of this increase in traffic and associated impacts must be analyzed in an EIR.

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IV. Conclusion

If a lead agency is presented with a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it

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may also be presented with other substantial evidence that the project will not have a significant effect. *See* CEQA Guidelines § 15064 (f)(1). Here, the Initial Study's analysis of environmental impacts is incomplete without considering the increased operations caused by the Project. Without such an analysis, the Initial Study and Negative Declaration do not satisfy the basic tenets of CEQA and cannot be approved until further analysis is performed for this Project.

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Cont'd

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Benjamin Gonzalez

Attachments

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SHUTE, MIHALY
& WEINBERGER LLP

4-7

ATTACHMENT 1

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April 10, 2017

Via E-Mail and FedEx

Angelica Espiritu
City Planner
Los Angeles World Airports
1 World Way
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LAXstakeholderliaison@lawa.org

Re: LAX Terminals 2 & 3 Modernization Project Draft Environmental Impact Report

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Dear Ms. Espiritu:

On behalf of the City of El Segundo ("El Segundo"), we submit the following comments on the Draft Environmental Impact Report ("DEIR") for the Los Angeles International Airport ("LAX") Terminals 2 and 3 Modernization Project (the "Project"). As Los Angeles World Airports ("LAWA") is aware, El Segundo has been closely monitoring plans for, and implementation of, development at LAX, including this Project. El Segundo has already expressed its deep concern about LAWA's approach of assuming, without evidence, that renovating and expanding LAX facilities *never* influences growth in passenger traffic or aircraft operations—or the environmental impacts this growth would cause—because all future increase in traffic is allegedly inevitable regardless of any physical change to the airport. Not surprisingly, LAWA has again relied on this approach for this Project, just as it relied on it for the LAX Landside Access Modernization Program ("LAMP").[1]

Like LAMP, this Project is enormous: among other things, it would *double* the square footage of Terminals 2 and 3, widen Terminal 3 by 90 feet (45 feet on each side), and demolish and reconstruct parts of both concourses and associated passenger and

[1] The Board of Airport Commissioners approved the LAMP on March 2, 2017. El Segundo has appealed BOAC's certification of the Final EIR and associated approvals to the LA City Council.

baggage facilities. This work would take nearly 6.5 years, necessitating around-the-clock shifts for most of the time, and requiring disturbance of approximately 1.5 million square feet (including 134,400 cubic yards of cut-and-fill). Yet, despite the Project's scale, including the addition of up to 3 new passenger gate positions, LAWA categorically denies it could have *any* influence on the number of aircraft operations in and out of the airport, or on LAX's ability to accommodate over 95 million annual passengers ("MAP") by 2040.[2]

With this Project, like with LAMP, LAWA appears determined to avoid complying with the California Environmental Quality Act ("CEQA") by disowning any responsibility for the significant noise, air quality, climate change, and other environmental impacts of airport development, instead claiming that impacts from increased growth would occur anyway even with *current* facilities at LAX. For the reasons discussed herein, this approach is fundamentally flawed. Thus, the DEIR must analyze the full scope of the Project's environmental effects, including the impacts of increasing the total number of passenger gate positions, regardless of whether there is no net change to "linear frontage" or apron area at Terminals 2 or 3. This letter explains El Segundo's concerns about the Project and identifies specific impacts that LAWA should carefully evaluate as part of an informative and comprehensive EIR.[3]

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I. The DEIR's Description of the Project and Environmental Setting are Inaccurate and Misleading.

A. The Project Description Misidentifies the Operative Constraint on Existing Aircraft Operations, Which the Project Would Remove.

[2] In its most recent (2040) Regional Transportation Plan ("RTP"), the Southern California Association of Governments ("SCAG") forecasted 96.6 MAP as the maximum passenger capacity for LAX in the year 2040. *See* SCAG 2040 RTP Aviation Appendix (attached as Exhibit A). Before LAWA released the LAMP DEIR (which relied on the RTP's passenger growth forecast to avoid responsibility for, and thus analysis of, the LAMP's growth-inducing effects), El Segundo filed suit against SCAG, challenging its environmental analysis for the RTP's passenger growth forecast for LAX under CEQA. After reaching settlement of its claims with SCAG, El Segundo dismissed its lawsuit.

[3] El Segundo furthermore requests that LAWA keep the public comment period open until LAWA responds to El Segundo's request under the Public Records Act for records relating to the addition of passenger gates at Terminals 2 and 3. *See* Exhibit B. Please make any records responsive to this request part of the administrative record for the Project.

Throughout the DEIR, LAWA claims that the Project's doubling of the existing square footage of Terminals 2 and 3 is merely to enhance the "passenger experience" and comply with security and screening regulations, and would not allow LAX to process more passengers than would be possible without the Project. *See, e.g.,* DEIR at 2-27 ("[T]he 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."). This is a bare assertion unsupported by evidence.[4] El Segundo has already explained at length in its comments on the LAMP DEIR and FEIR why LAWA cannot assume, without evidence, that major airport renovations—whether doubling the size of two passenger terminals with this Project, or relieving ground access constraints in the case of LAMP—would not help LAX to meet demand that it otherwise would be unable to meet. In order for LAWA not to analyze the effect of the Project on increased passenger and aircraft operations at LAX, the DEIR must demonstrate that LAX could accommodate SCAG's maximum forecasted capacity even without any changes to the airport before 2040 (including the Project). *See* El Segundo's comments on the LAMP DEIR at 2-5, attached as Exhibit C; El Segundo's comments on the LAMP FEIR at 1-4, attached as Exhibit D. El Segundo's comments on the Terminals 2 and 3 Modernization Project hereby incorporate by reference these comments on the LAMP DEIR and FEIR, including all attachments and exhibits thereto.

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Here, LAWA also claims that the addition of up to 3 new passenger gate positions at Terminals 2 and 3 is simply to be "compatible" with other changes to the terminals and "anticipated airline fleets and uses," and would have no influence on the number of aircraft operations because the Project would not increase the "linear frontage" or apron depth at these terminals. *See, e.g.,* DEIR at 2-24 ("Improvements to the aircraft apron areas also include reconfiguration of passenger boarding bridge locations, aircraft fueling system hydrant locations, and ground support equipment parking locations at T2 and T3 to be compatible with proposed changes to the T2/T3 buildings and anticipated airline fleets and uses.") Thus, LAWA claims, the additional passenger gates and any associated change in aircraft operations would not occur as a "result" of the Project. As discussed further below, this claim is incorrect as a matter of CEQA case law, including the state supreme court's decision in *Communities for a Better Environment v. South Coast Air Quality Management District*.

[4] Furthermore, as a practical matter, it would not make sense for LAWA to *double* the square footage of the two terminals unless to allow greater throughput of passengers. LAWA's claim that the twofold increase in terminal size is simply to make travel more "convenient" does not hold water.

LAWA's own shifting descriptions of, and attempts to justify, the Project's addition of passenger gate positions belies this rationale. LAWA initially suggests that the Project *incidentally* would "allow for the reconfiguring of the passenger gate positions and aircraft-parking layout around T2 and T3 to match aircraft fleet requirements, which could result in there being additional passenger gate positions (increasing the total gates at T2 and T3 from 24 to 27 passenger gate positions)." *See* DEIR at 2-2; *id.* at 2-24. The statement that adding gates would enable LAWA to "match aircraft fleet requirements" implies that the current passenger gate configuration prevents a more efficient use of gates.[5] *See id.* at 2-27 ("Because of gate dependencies not all aircraft parking positions can be simultaneously used to *maximum capacity*."). Thus, the Project's reconfiguration of gate positions, within existing linear frontage and apron depth constraints, would free up positions that aircraft are presently prevented from using most efficiently. *See id.* ("Airlines operating at T2 and T3 have the ability to re-gauge . . . or rearrange the aircraft parking configurations around each terminal within the constraint of the existing passenger terminal apron areas and parking limit lines."). Ultimately, LAWA admits that the reconfiguration of gates is about enabling the airport to *meet demand*, stating that "airlines configure aircraft parking positions to best match their aircraft fleet and provide the greatest flexibility throughout the day to meet their demand." *Id.* at 2-25. In other words, without the Project, the airlines either could not serve demand as efficiently or possibly, in some cases, at all; for instance, if airlines are unable to operate flights at certain times of day due to "dependencies."

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Thus, the project description mischaracterizes the operative "constraint" on aircraft operations. It is not, as LAWA claims, the "linear frontage" and apron depth, both of which may well be unaffected by the Project. The actual constraint is "dependencies" and the resulting lack of "flexibility throughout the day to meet [] demand," both of which LAWA admits would be alleviated by the Project. This undercuts LAWA's basic premise that LAX would be able to meet passenger demand

[5] The DEIR says nothing about so-called "fleet requirements," any limitation they impose on current aircraft operations at Terminals 2 and 3, and how the Project would help "match" passenger gate layout with these fleet requirements. This information is necessary for a full description of existing conditions and the impact of the Project on aircraft operations. Pursuant to the California Public Records Act, please provide and include as part of the administrative record all documents related to "fleet requirements" as this term is used in the DEIR, including any "requirement" (whether of a legal nature or otherwise) that LAWA add gate positions to "match" or comply with anticipated airline "fleets or uses."

regardless of the Project. LAWA therefore must analyze the increase in aircraft operations that would be enabled by the Project, and the environmental impacts of the increase in operations, including the cumulative operational impacts of the addition of other gates LAWA has indicated it plans to construct. *See* Exhibit B at 32.

B. The DEIR Omits a Description of How Additional Gate Positions Would Be Accommodated Within the Existing Linear Frontage, Including the Number of Existing Narrow Body Equivalent Gates.

The DEIR acknowledges that the Project will add and reconfigure gates at Terminals 2 and 3 to improve LAX operations (e.g., increase efficiency, respond to the desires of airlines, and accommodate expected aircraft fleet mix). LAWA attempts to characterize this increase in the number of gates and overall intensity of their use as irrelevant from capacity standpoint. LAWA does so through the following tortured logic:

First, LAWA introduces and relies on a new concept: terminal linear frontage. LAWA defines this term as the area around an existing terminal that is within the designated parking limit lines and would theoretically be available for aircraft parking.[6] LAWA then argues that Terminals 2 and 3 currently have unused and/or underutilized terminal linear frontage. So, while Terminal 2 currently has just 10 somewhat outdated passenger gates, reconfiguration within the existing terminal linear frontage would actually allow for 13 gates in a more intensive use scenario. Similarly while Terminal 3 currently has just 13 passenger gates, LAWA argues that its existing terminal linear frontage would actually allow for 14 gates in a more intensive use scenario.

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LAWA then concludes that it need not evaluate the potential growth and environmental impacts associated with intensifying and adding gates at Terminals 2 and 3 because all the changes would be taking place within the existing terminal linear frontage. This conclusion is seriously flawed and ignores the obvious:

a. While there may currently be room within the existing terminal linear footage of Terminals 2 and 3 to add gates, those gates do not now exist.

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[6] LAWA does not explain whether, where or how this concept is used more broadly in the aviation industry, FAA's airport planning documents, or academic research. Tellingly, the concept is missing from LAWA's own glossary of "airport terminology." DEIR at 1-5. El Segundo hereby requests, pursuant to the California Public Records Act, that LAWA provide and include as part of the administrative record all reference and background material used by LAWA in developing and applying the terminal linear frontage concept in connection with the Project.

b. The more aircraft gates a terminal has, the more aircraft flights and greater passenger throughput it will support.

c. Even putting aside the addition of gates, reconfiguring existing gates to gain efficiency is itself a physical change in the environment likely to lead to additional aircraft flights and greater passenger throughput.

d. Adding aircraft flights and passengers to LAX has direct implications for environmental issues such as traffic, noise, air pollution, and greenhouse gas emissions, all of which tend to increase as flights and passengers increase. None of those implications are evaluated at all in the DEIR because LAWA categorically refuses to acknowledge the Project will increase capacity, passenger throughput, and aircraft operations at LAX, and provides no associated analysis of environmental impacts.

LAWA's approach is inappropriate from a technical standpoint and based on insufficient information. From a technical standpoint, LAWA does not adequately explain the mechanism by which use of the existing terminal linear frontage around Terminals 2 and 3 would be intensified to fit three additional gates and reconfigure the rest. Based on the inadequate information provided by LAWA, it appears possible that at Terminals 2 and 3, the Project would squeeze more aircraft parking positions/gates into the same area by converting areas currently and historically used for aircraft support functions (e.g., baggage cart staging) to aircraft parking area. The aircraft support uses, in turn, are displaced into other areas enlarged as part of the Project. Additionally, it appears that as part of the Project, aircraft would be parked further to the south (closer to World Way) than has historically been the case. The Project may also increase the area available for aircraft parking around Terminal 3 by removing the southern appendages and/or making use of areas closest to the ticketing areas. On the whole, however, the DEIR contains insufficient information to allow the public to understand exactly how the Project would achieve the proposed increase in the number of gates and overall intensification of aircraft parking areas around Terminals 2 and 3. LAWA must supplement the materials provided to address this shortcoming.

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The significant difference between the current condition and the proposed, more intensified condition is somewhat apparent by comparing DEIR Figure 2-13 (aerial photo of current configuration, which shows 23 actual aircraft gates) with DEIR Figure 2-14 (LAWA's hypothetical layout showing 27 narrow body equivalent gates ("NBEG") around Terminals 2 and 3 as they now exist). Missing from the DEIR, however, is a figure like DEIR Figure 2-14 showing the actual existing configuration and size/location of aircraft gates. Such a figure is important and must be added in a recirculated DEIR. We anticipate that it will reveal that under the existing condition, some areas of the

"terminal linear frontage" are not currently used for aircraft gates/parking, as they would be under the proposed Project. Those areas may be used for aircraft support functions or be unavailable for aircraft parking due to difficult geometry. It is critical that the DEIR explain precisely the mechanisms by which the proposed Project will reconfigure use of the terminal linear frontage to allow more intensive use. Even without the necessary detail, however, it is readily apparent that the proposed Project would increase capacity by making use of space not currently used for aircraft parking.

The missing/requested figure would also help explain to the public how LAWA has calculated the NBEG equivalent of its existing aircraft gates at Terminals 2 and 3. The details of that calculation are critical to understanding how the Project would modify existing conditions and the extent to which the Project would increase gates and capacity. Currently, however, that detail is missing from the DEIR. Instead of providing information about the actual current NBEG numbers at Terminals 2 and 3, LAWA provides an "estimate" of the existing linear terminal area frontage. DEIR at 2-25. LAWA must provide additional details explaining how this estimate was derived. It must also provide additional details about how the terminals are actually currently configured (e.g., number and size of gates, NBEG equivalent, and wingtip separation). The DEIR's current approach of presenting the public with "estimated" and "hypothetical" is unacceptable under CEQA and wholly unnecessary when LAWA could simply measure and report on actual existing conditions.

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LAWA's approach also violates the basic requirements of CEQA for a number of reasons. CEQA requires the lead agency to evaluate the potential impacts of the project relative to existing physical conditions (i.e., the existing baseline). At Terminals 2 and 3, the existing physical condition includes three fewer gates than would be present following implementation of the Project. This increase in capacity associated with this increase in the number of gates must be acknowledged and evaluated by LAWA.

LAWA's reliance on the "terminal linear frontage" concept is a blatant attempt to avoid its clear obligations under CEQA. El Segundo does not question that terminal linear frontage can constrain the number of gates that fit around a given terminal. Likewise, El Segundo does not doubt that the Project will more intensively and efficiently use the space area around Terminals 2 and 3. The point, however, is that the existing condition around Terminals 2 and 3 is not currently used as intensively as proposed, so LAWA cannot treat the proposed condition as the existing condition. *See Communities for a Better Environment v. South Coast Air Quality Management District* (2010) 48 Cal.4th 310, 322 (proper baseline for proposed change to existing facility is physical conditions existing at the time of CEQA analysis, not maximum potential operations). Put another way, LAWA is taking the position that because there is

apparently room to squeeze more gates around Terminals 2 and 3, it should be allowed to do so without evaluating how this will increase airport capacity and operations.[7]

An analogy may be helpful here: Imagine a one-acre vehicle parking lot built many decades ago. The lot has been painted with wide parking stalls and includes planter areas with trees and shrubs. The owner of the parking lot can modernize the parking lot to fit more cars by restriping some of the stalls to accommodate only compact vehicles and by eliminating landscaping. One can easily imagine a scenario where the parking lot owner successfully increases the number of parking stalls by 10% on the same one-acre lot. Under that scenario, the lot would accommodate 10% more vehicles and people. That kind of efficiency makes a lot of sense, and it is precisely what LAWA logically seeks to do with the Project for aircraft gates at Terminals 2 and 3. The problem is that LAWA denies that is what it is doing because it does not want to come clean with the public regarding the extent to which these gate reconfigurations and additions will increase LAX aircraft operations and passenger throughput and the associated environmental impacts. The problem with LAWA's argument is all the more significant because taken to its logical extent, that argument would allow LAWA to add and reconfigure gates—without limitation—at any of LAX's existing terminals without doing any analysis of capacity increase or associated environmental impacts. That approach is not consistent with the requirements of CEQA.

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Viewing the situation from the perspective of El Segundo's residents may also help LAWA to understand the problem. The main impacts El Segundo residents experience due to the operation of LAX are traffic, air pollution, and noise. Those impacts are, in turn, driven by the number of passengers who use LAX and the number of aircraft flights at LAX. The existing terminal linear frontage at LAX does not, by itself, produce any impacts to El Segundo residents. Traffic, air pollution, and noise impacts to El Segundo residents are only felt when terminal linear frontage is used for aircraft gates.

[7] It is important to note that LAWA has not provided any aerial photos or other evidence indicating that Terminals 2 and 3 have ever been configured to include more gates than shown in Figure 2-13. Additionally, because El Segundo has been conducting regular gate counts at LAX since roughly 2006, we know that at least since then, Terminals 2 and 3 have never had gates accommodating the number and intensity of gates proposed as part of the Project.

The more gates LAWA squeezes into its existing terminal linear frontage, the more impacts will flow to El Segundo.[8]

Historically, LAWA has acknowledged that the number and configuration of gates at LAX serves as a key constraint on operations and growth. *See, e.g.,* CEQA documents for SPAS and Master Plan, attached hereto as Exhibits E through F and incorporated herein. With the proposed Project, however, LAWA would increase the number of gates without doing any analysis of the impact on LAX capacity and operations. LAWA's position in the DEIR with respect to gates essentially asks El Segundo residents to trust, without analysis, that no additional traffic, air pollution, or noise will result from the Project. LAWA's sole reasoning for this is that the Project does not increase terminal linear footage. But from the perspective of El Segundo residents, this is no comfort and makes no sense. That is particularly true when you consider the fact that, although not discussed in any detail in the DEIR, the purpose of the Project is to accommodate Delta Airlines, which has substantial expansion planned at LAX.[9] *See* news articles attached as Exhibit H.

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Interestingly, to the extent the DEIR discusses airport capacity at all, it focuses solely on passenger throughput. It says nothing about the Project's impact on LAX's capacity to accommodate increased aircraft operations (takeoffs and landings). DEIR 2-2. This is a critically important omission fatal to the DEIR's analysis. In fact, adding aircraft gates, as the DEIR acknowledges the Project will do, will have the direct result of allowing LAX to support additional aircraft operations. Additional aircraft operations will increase noise, air pollution, and greenhouse gas emissions but the DEIR provides no analysis of these impacts.

There is also grounds for considerable skepticism about LAWA's estimate that the post-Project condition will accommodate only 27 NBEG gates. Most notably, the DEIR provides no figure showing the size, number and configuration of gates following Project completion (or at any interim phase during construction). This is major missing piece of the project description. LAWA must provide additional information regarding how it calculated the 27 NBEG number for the post-Project scenario.

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[8] Similarly, impacts to El Segundo increase as airlines squeeze more flights into existing aircraft gates, squeeze larger aircraft into those gates, and squeeze more passengers onto planes.

[9] The intent of LAWA and Delta with respect to gates and other issues is described in detail in the lease materials attached hereto as Exhibit G.

In sum, LAWA claims, without substantial evidence in support, that the Project will not increase passenger capacity. DEIR 2-2. The only basis for LAWA's assertion is the argument that the Project would not increase "terminal linear frontage." In fact, reconfiguring and adding to the passenger gates (particularly when paired with the massive terminal expansion proposed) will allow the airline(s) operating those gates to use them more intensively. This will enable increased passenger throughput at LAX and lead to additional flights. To comply with CEQA, the DEIR must analyze the impacts of this change.[10]

II. The Project Will Result in Noise Impacts that Must Be Adequately Analyzed in the DEIR.

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

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

Furthermore, the current Noise Exposure Map for LAX, approved at the end of 2015, does not anticipate operations at the levels made possible by the Project. *See* Exhibit K, Final Noise Exposure Map Report (August 2015), at 3-10 (stating current noise contour is based on review of Master Plan Alternative D Report, Specific Plan Amendment Study, Midfield Satellite Concourse North Draft EIR, West Aircraft

[10] We hereby incorporate by reference the report of Dr. Adib Kanafani, Ph.D., NAE, attached as Exhibit I. We respectfully request a response to each of the issues raised in the Kanafani Report.

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

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

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Finally, the DEIR's failure to provide any analysis of noise impacts from the Project's construction is a fatal flaw. Haul trucks, in particular, can be quite noisy. Moreover, the DEIR indicates that much of the construction will occur at night in an attempt to reduce construction-related traffic impacts. Increased noise levels at night can be particularly disruptive and can interfere with sleep. 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 projects identified in DEIR Tables 3-1 and 3-2.

III. The DEIR's Analysis of and Mitigation for the Project's Impacts on Transportation Are Inadequate.

Transportation in and around LAX is a critical issue, especially for the City of El Segundo, which shares a border with the airport. Unfortunately, the DEIR's analysis of transportation impacts fails to achieve CEQA's most basic purpose: informing governmental decisionmakers and the public about the potential significant environmental effects of a proposed activity. Tit. 14, Cal. Code Regs ("CEQA Guidelines") § 15002(a).

The report prepared by MRO Engineers ("MRO Report") provides detailed comments on the shortcomings in the DEIR's transportation impact analysis.[11] *See* Letter from N. Liddicoat, MRO Engineers, to L. Impett, March 29, 2017, attached as Exhibit L. Set forth below is a summary of some of the DEIR's most troubling errors.

A. The DEIR Fails Entirely to Evaluate the Project's Operational Impacts.

The DEIR's traffic analysis focuses exclusively on how traffic conditions would change as a result of the Project's construction. It fails to provide *any* analysis of the Project's operational traffic impacts under the misguided assumption that the proposed Project would have no effect on passenger numbers and flight operations. DEIR at 2-2. As discussed above, this assumption is incorrect. The Project would improve passenger levels of service and therefore has the potential to increase passenger capacity. Had the DEIR preparers recognized this fact, they would have realized that increased passenger capacity would result in increased traffic to and from the airport. The EIR should be revised to evaluate the effect that this increase in traffic would have on the local and regional transportation network.

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B. The DEIR Relies on an Undersized Study Area to Evaluate the Project's Traffic Impacts.

The DEIR understates the Project's traffic impacts because it relies on a study area that barely extends beyond the boundaries of LAX. The DEIR asserts that only an insignificant amount of the construction traffic will travel east of La Cienega Boulevard, south of Imperial Highway or Interstate 105, or north of Westchester Parkway or Howard Hughes Parkway. *See* DEIR at 4.4-3. As we explain below in the following section, traffic impacts from the construction of the proposed Project would inevitably impact roadways, intersections and freeways outside of the DEIR's narrow study area. Moreover, even within the limited study area that the DEIR does include, numerous intersections are ignored entirely. In particular, the following locations were evaluated in the recent DEIR for the LAMP but were not included in this DEIR's analysis:

- Sepulveda Boulevard & I-105 Westbound Ramps,
- Sepulveda Boulevard & Mariposa Avenue,

[11] We respectfully request a response to each of the issues raised in the MRO Report.

- Sepulveda Boulevard & Grand Avenue,
- Sepulveda Boulevard & El Segundo Boulevard,
- Sepulveda Boulevard & Rosecrans Avenue,
- Avion Drive & Century Boulevard,
- Airport Boulevard & Century Boulevard,
- Nash Street & El Segundo Boulevard,
- Douglas Street & El Segundo Boulevard,
- Bellanca Avenue & Century Boulevard,
- Aviation Boulevard & West 120th Street,
- Aviation Boulevard & El Segundo Boulevard,
- Concourse Way & Century Boulevard,
- La Cienega Boulevard & West 120th Street,
- La Cienega Boulevard & El Segundo Boulevard,
- El Segundo Boulevard & I-405 Northbound Ramps, and
- Inglewood Avenue & Imperial Highway.

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CEQA prohibits use of a truncated study area to avoid disclosing a project's impacts. The California Supreme Court emphasized that an EIR may not ignore the regional impacts of a project approval, including those impacts that occur outside of its borders; on the contrary, a regional perspective is required." *Citizens of Goleta Valley v. Board of Supervisors* (1990) 52 Cal.3d 553, 575. An EIR must analyze environmental impacts over the entire area where one might reasonably expect these impacts to occur. *See Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 721-23. This principle stems directly from the requirement that an EIR analyze all significant or potentially significant environmental impacts. Pub. Res. Code §§ 21061, 21068. An EIR cannot analyze all such environmental impacts if its study area does not include the geographical area over which these impacts will occur. As we discuss below, the DEIR's flawed study area also implicates its analysis of cumulative traffic impacts.

C. The DEIR Fails to Adequately Analyze the Project's "Temporary" Traffic Impacts.

Similar to the flawed approach taken in the LAMP EIR, this DEIR's traffic analysis focuses only on the roads and intersections that would be used by construction employees and truck traffic associated with construction of the Project. DEIR at 4.4-3. While an analysis of these roads and intersections is important, these are not the only locations that would be impacted by this lengthy construction project. Construction operations and activities would inevitably require road and/or lane closures have the potential to cause traffic to back up on adjacent roads and intersections. Construction trucks traveling along the planned haul routes would also likely cause motorists to detour to alternative, less-congested roadways. The DEIR's failure to evaluate impacts at these other locations is an egregious error.

Construction projects at airports are notorious for causing massive traffic jams. *See, e.g.*, "Report: LAX Traffic Could be Getting a Whole Lot Worse," E. Chiland, Curbed Los Angeles, March 10, 2016, attached as Exhibit M; "Construction at LaGuardia Airport Causing Gridlock, Traffic Nightmares," J. Einiger, ABC News, August 23, 2016, attached as Exhibit N. Construction projects at airports are unlike construction projects on a typical city block. If a project is constructed in Downtown Los Angeles, for example, motorists have a variety of alternative routes to choose from to reach their destination. In other words, they can simply avoid traveling near the construction site. Motorists with flights to/from LAX, however, have no choice; they cannot avoid construction activities at the airport unless they travel by transit. Moreover, rebuilding in the limited confines of an operating airport, because there are so few roads accessing the terminals, will inevitably cause traffic to spill over to off-airport roads and even cause massive back-us on freeways such at the I-405. This is especially likely at a major airport like LAX which brings about 76,000 vehicles per day into the airport's central terminal area and more than 6,000 vehicles into the airport every hour.[12]

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The DEIR does nothing more than pay lip service to these types of impacts. The document does identify thresholds of significance intended to address what the DEIR refers to as "temporary" construction impacts. DEIR at 4.4-27, -28. These thresholds state that the Project would result in a significant impact if lanes are closed for more than one day or if the Project results in the loss of vehicular access *for more than one day*. *Id.*

[12] *See* "A Better Flight Plan for LAX: L.A. Controller's Report Warns of Impending Traffic Crisis; Urges Improved Passenger Experience, Business Practices," *available at* http://www.lacontroller.org/lawa (last visited October 10, 2016).

emphasis added. Yet, rather than actually analyze the Project's construction-related impacts against these thresholds, the DEIR provides a superficial, one-paragraph discussion before concluding that impacts would be less than significant. Unfortunately, this truncated discussion raises more questions than it answers.

For example, the DEIR simply states that lane closures would occur during the night shift whenever possible, and that it is unlikely that lane closures would be required for any extended period of time. DEIR at 4.4-29. The DEIR does not identify the locations of these lane closures. The phrases "whenever possible" and "extended period of time" are never defined and are therefore meaningless. CEQA requires that environmental impact analyses be detailed, complete, and reflect a good faith effort at full disclosure. CEQA Guidelines § 15151. Thus the document should provide a sufficient degree of analysis to inform the public about the proposed Project's adverse environmental impacts and to allow decisionmakers to make intelligent judgments. *Id.* Consistent with this requirement, the information regarding the project's impacts must be "painstakingly ferreted out." *Environmental Planning and Information Council of Western El Dorado County v. County of El Dorado* (1982) 131 Cal.App.3d 350, 357 (finding an EIR for a general plan amendment inadequate where the document did not make clear the effect on the physical environment). 4-7 Cont'd

Notwithstanding the DEIR's superficial discussion of "temporary" impacts, the document ultimately explains that the Project's construction could result in lane closures that could extend up to one week. In violation of its own significance thresholds, the DEIR concludes that these lengthy lane closures would not constitute a significant effect. Because the DEIR's own information confirms that the Project's construction-related impacts would be significant, the EIR must be revised and recirculated.

The revised analysis must take into account the Project's cumulative construction-related impacts. As discussed below, LAX is planning myriad large-scale projects with simultaneous construction schedules. The revised EIR must analyze how the traffic from all of these projects would effect the local and regional roadway system.

D. The DEIR Fails to Adequately Analyze Impacts to El Segundo From Construction-related Haul Trucks.

The proposed Project would result in a substantial increase in truck traffic, particularly on West Imperial Highway along the northern edge of El Segundo's city limits. In fact, as much as 67 percent of the Project-related trucks would use West Imperial Highway, as follows:

- 32 percent regional trips to/from the east on I-105;
- 23 percent regional trips to/from the south on I-405;
- 5 percent local trips to/from the east on West Imperial Highway;
- 5 percent local trips to/from the south on Sepulveda Boulevard; and
- 2 percent local trips to/from the south on Aviation Boulevard. *See* DEIR Figure 4.4-3 at p. 4.4-20.

According to MRO Engineers, trucks have an inordinate adverse effect on traffic operations and safety, due to their size and operating characteristics, particularly with regard to slower acceleration, longer braking distances, and the need for greater separation between vehicles. MRO Report at 5. The DEIR largely ignores the effects these trucks would have on West Imperial Highway and the Project's other haul routes. For example, the DEIR does not analyze the potential safety-related impacts associated with mixing automobile traffic with a substantially increased volume of heavy-truck traffic. Nor does the DEIR provide *any* analysis of the effect that trucks have on pavement condition. The addition of substantial volumes of heavy trucks will take a toll on the condition of the pavement on West Imperial Highway and the Project's other haul routes. Because the DEIR does not evaluate this impact, it also fails to identify any alternatives or mitigation. The revised EIR must do so, including an evaluation of other feasible haul routes and the identification of measures to maintain roads used for LAX-related construction projects, in an acceptable condition. As regards West Imperial Highway in particular, the revised EIR should include a measure requiring that LAWA commit to the complete reconstruction (base and surface) of this roadway. Following reconstruction, LAWA must commit to regular resurfacing as needed to ensure that the Pavement Condition Index remains in the good (A-rated) range.

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E. The DEIR's Analyze of Cumulative Traffic Impacts is Legally Inadequate.

An EIR must discuss a Project's significant cumulative impacts. CEQA Guidelines § 15130(a). A legally adequate cumulative impacts analysis views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable future projects whose impacts might compound or interrelate with those of the project at hand. "Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." CEQA Guidelines § 15355(b).

A project has a significant cumulative effect if it has an impact that is individually limited but "cumulatively considerable." *Id.* §§ 15065(a)(3), 15130(a). "Cumulatively considerable" is defined as meaning that "the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects." *Id.* § 15065(a)(3). Cumulative impacts analysis is necessary because "environmental damage often occurs incrementally from a variety of small sources [that] appear insignificant when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact." *Communities for a Better Env't v. Cal. Res. Agency* (2002) 103 Cal.App.4th 98, 114. Here, the DEIR's analysis of cumulative impacts is incomplete, cursory and superficial.

As an initial matter, although the DEIR identifies 26 past, present, and reasonably foreseeable future projects that would be developed at or adjacent to LAX, it includes only eight of these projects in the cumulative traffic analysis. *See* Tables 3-1 and 4.4-6. The DEIR ignores the traffic generated by the other eighteen LAX projects claiming that they would have no impacts because they would not have concurrent construction schedules. DEIR at 4.4-19. Compounding this error, the DEIR acknowledges another 212 probable development projects in the vicinity of LAX, i.e., the Cities of Los Angeles, Culver City, El Segundo, Manhattan Beach, Lawndale, Inglewood, Hawthorne, and the County of Los Angeles (*see* DEIR Table 3-2), but it also does not include the traffic from these projects in its cumulative impact analysis. 4-7 Cont'd

The DEIR's failure to analyze the impacts from all of these related projects is a clear violation of CEQA's requirements. The fact that these other projects may not be under construction at the same time is not the only factor that must be considered. The DEIR must analyze traffic from all of the projects (both airport and non-airport projects) if the traffic from those other projects would compound or interrelate with the proposed Project's traffic impacts.

The DEIR's failure to thoroughly analyze the Project's cumulative traffic impacts is not a trivial detail. Some proportion of the trucks used to construct these 238 projects in the LAX vicinity will inevitable travel on El Segundo roads. As discussed above, construction projects which result in a substantial increase in the volume of trucks on area roadways increase the risk of automobile-truck accidents. In addition, trucks also result in substantial deterioration in roadway pavement.

The revised EIR must identify the total number of truck trips that would travel on El Segundo roads from all of these development projects and analyze the effects that this massive increase in truck traffic would have on roadway safety and pavement condition.

The EIR must identify feasible mitigation measures as these impacts will certainly be significant.

F. The DEIR Fails to Mitigate the Project's Significant Construction Impacts.

Notwithstanding the DEIR's faulty traffic analysis, it concludes that certain cumulative impacts would be significant and unavoidable. DEIR at 4.4-40. We disagree that these impacts are unavoidable. Because LAWA is the lead agency and the sponsor for at least 26 of the projects that are contributing to these significant effects, the agency certainly could eliminate certain projects or, at a minimum, stagger their implementation.

The DEIR does include one measure calling for LAWA to prepare a construction traffic management plan prior to initiation of construction. *See* DEIR at 4.4-40. As we explained in our comments on the LAMP EIR, the DEIR lacks the required evidentiary support that this measure—which merely punts the problem to a later date—would even begin to address the complexities and challenges that would accompany this major construction project. *See* El Segundo Comments on LAMP DEIR at 19-25. This letter identified a series of measures that LAWA could implement to reduce the LAMP project's construction-related traffic impacts. *Id*. Specifically, the LA Controller's Office recommended numerous actions that LAWA should undertake to manage the disruptions that would inevitably occur during that project's construction. *Id*. Those same measures should be implemented for the proposed Project to reduce the project-specific and cumulative construction-related impacts.

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IV. The DEIR Fails to Adequately Analyze the Project's Air Quality Impacts.

A. The DEIR's Failure to Evaluate the Project's Operational Impacts is an Egregious Flaw.

The DEIR explains that emissions from aircraft and ground support equipment were not included in the air quality analysis because the Project would not increase aircraft operations or passenger volumes. DEIR at 4.1-1. Consequently, the DEIR's air quality analysis focuses exclusively on construction- and energy-related operational emissions. As discussed above, the assertion that the Project would not increase aircraft operations or passenger volumes disregards the effect that improved access to terminals would have on passenger numbers and flight operations. The modification of the terminals will result in capacity increases and operational changes that in turn will result in an increase in air emissions. Consequently, the EIR should be revised to identify the Project's potential to increase emissions from aircraft and ground support equipment.

B. The DEIR's Analysis of the Project's Cumulative Air Quality Analysis is Riddled With Flaws.

The DEIR's analysis of cumulative impacts suffers from several flaws which undermine the integrity of the analysis. First, the DEIR errs because it fails to recognize that the Project's increase in particulate emissions constitutes a cumulatively significant impact. Second, the DEIR fails to analyze the cumulative air quality effects from the related development projects in the region.

1. The Project's Increase in PM_{10} and $PM_{2.5}$ Emissions Constitutes a Cumulatively Significant Impact.

In the South Coast Air Basin, PM_{10} and $PM_{2.5}$ levels exceed the National Ambient Air Quality Standards and the California Ambient Air Quality Standards. DEIR at 4.1-18. Ambient air quality standards define clean air, and are established to protect even the most sensitive individuals in our communities. An air quality standard defines the maximum amount of a pollutant that can be present in outdoor air without harm to the public's health.[13]

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The DEIR concludes that the Project's potential to increase PM_{10} and $PM_{2.5}$ emissions would be less than significant, i.e., less than the South Coast Air Quality Management District's thresholds of significance. *Id.* at 4.1-20. The DEIR determines that the proposed Project, together with other LAX-related projects would result in cumulatively significant PM_{10} and $PM_{2.5}$ impacts but that the Project's contribution to these cumulative impacts would *not* be cumulatively considerable. *Id.* at 4.1-24. The DEIR's flawed approach for determining the Project's contribution to this cumulative impact has been explicitly rejected by the courts.

In *Kings County Farm Bureau*, the court invalidated an EIR that concluded that increased ozone impacts from the project would be insignificant because it would emit relatively minor amounts of precursor pollutants compared with the large volume already emitted by other sources in the county. 221 Cal.App.3d at 717-18. The court aptly stated, "The relevant question to be addressed in the EIR is not the relative amount of precursors emitted by the project when compared with preexisting emissions, but whether any additional amount of precursor emissions should be considered significant in light of the serious nature of the ozone problems in this air basin." *Id.* at 718. Similarly, in *Los Angeles Unified School District v. City of Los Angeles*, the court invalidated an EIR that

[13] *See* California Air Resources Board Ambient Air Quality Standards, available at https://www.arb.ca.gov/research/aaqs/aaqs.htm (last accessed March 27, 2017).

deemed a project's cumulative traffic noise impact insignificant in light of existing traffic noise in the project area. 58 Cal.App.4th 1019, 1025-26.

Likewise here, the DEIR may not minimize the Project's cumulative PM_{10} and $PM_{2.5}$ impacts given that the South Coast Air Basin already violates the PM_{10} and $PM_{2.5}$ ambient air quality standards. Indeed, these existing adverse conditions weigh in favor of a finding of significance. *Kings County Farm Bureau*, 221 Cal.App.3d at 718. The EIR should be revised to recognize that the Project's contribution to this impact is significant and identify feasible mitigation measures or alternatives capable of reducing this impact.

2. The DEIR Fails to Evaluate the Air Quality Impacts From Related Projects.

As discussed above, the DEIR identifies 212 probable development projects in the City of Los Angeles and neighboring communities within the general vicinity of LAX. *See* DEIR at 3-4 and Table 3-2. The DEIR, however, fails to analyze how the emissions from these projects would impact air quality, claiming that such an analysis would be speculative because LAWA does not have information on each of the project's construction details. *Id*. at 4.1-24. Such dismissive treatment of these potentially significant air quality impacts is not adequate under CEQA. Rather, LAWA must "use its best effort to find out and disclose all that it reasonably can" regarding these project's air quality impacts. *Citizens to Preserve the Ojai v. Ventura* (1986) 176 Cal.App.3d 421, 431; *see also Laurel Heights Improvement Assn. v. Regents of the University of California* (1988) 47 Cal.3d 376, 399 ("*Laurel Heights I*") ("We find no authority that exempts an agency from complying with the law, environmental or otherwise, merely because the agency's task may be difficult."). 4-7 Cont'd

Nor can the DEIR simply assume it is obligated to analyze only construction-related emissions from these other projects. Some of these projects would generate operational emissions as well. For example, the fueling station and Brotman Medical Center in Culver City; the 2,000,000 square foot Raytheon Campus Office Park Expansion Project, the "industrial addition," the Mattel Grand Way Project, the "warehouse, office and manufacturing" project in El Segundo; the gas station and the Chevron facility in Manhattan Beach; the office/warehouse project, gas station, Starbucks drive-through, the manufacturing/warehouse, and the Centinela Hospital expansion in Inglewood would likely generate air pollutant emissions during their operational phases. *See* DEIR at 3-4 and Table 3-2.

The revised EIR must make at least some attempt to analyze the emissions from the 212 development projects in vicinity of LAX. *See* CEQA Guidelines § 15144

("Drafting an EIR … necessarily involves some degree of forecasting"). This analysis must take into account the increase in operational as well as construction emissions.

V. The DEIR's Perfunctory Climate Change Analysis Fails to Inform the Public and Decisionmakers About the Project's GHG Emissions.

The DEIR's discussion of the Project's contribution to climate change fails to achieve CEQA's most basic purpose: informing governmental decisionmakers and the public about the potential significant environmental effects of a proposed activity. CEQA Guidelines § 15002(a)(1). Among its other flaws, the DEIR calculates only a portion of the greenhouse gas ("GHG") emissions for which the Project would be responsible and it fails to analyze the Project's consistency with state plans adopted for the purpose of reducing GHG emissions.

A. The DEIR's Failure to Evaluate the Project's Operational Impacts is an Egregious Flaw.

Similar to the DEIR's air quality impact analysis, the DEIR includes only certain of the emissions that would result from the proposed Project. The DEIR explains that because the Project would not change the number of airline passengers traveling to/through the airport the analysis does not include increases in GHG emissions from aircraft or ground support equipment. DEIR at 4.2-1; 4.2-4. For the reasons discussed above, the EIR should be revised to identify the increase in GHG emissions from aircraft and ground support equipment.

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B. The DEIR Fails to Evaluate the Project's Consistency With State and Regional Plans.

The DEIR includes two thresholds for determining the significance of the Project's environmental impacts relating to GHG emissions. One of these thresholds states that a project would be considered to have a significant impact if it would conflict with any applicable plan, policy or regulation adopted for the purpose of reducing the emissions of GHGs. DEIR at 4.2-16. Because the Project would result in a large increase in GHG emissions, the DEIR should have evaluated whether this increase in emissions would be inconsistent with state and regional plans. Unfortunately, the DEIR declines to conduct this analysis; it instead offers up a series of excuses.

First, it asserts that state and regional plans, policies and regulations are generally aimed at setting statewide and regional policy, and are not directed at individual projects. DEIR at 4.2-20. The DEIR includes no explanation as to why individual projects should

be exempt from a consistency determination with state and regional 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) (emphasis added). Finally, common sense dictates that individual projects must be held accountable for their roles in achieving or interfering with GHG reduction goals.

The DEIR then asserts that neither the AB 32 Scoping Plan, Executive Orders S-3-05 and B-30-15, nor SCAG's 2040 RTP provides a specific basis for calculating a project's "fair share" of statewide or regional GHG emissions. DEIR at 4.2-20. This excuse is also unavailing. As the CEQA Guidelines make clear, drafting an EIR necessarily involves some degree of forecasting. *See* Guidelines § 15144 ("Drafting an EIR … necessarily involves some degree of forecasting … [and] an agency must use its best efforts to find out and disclose all that it reasonably can"); *Communities for a Better Environment v. City of Richmond* ("*CBE*") (2010) 184 Cal.App.4th 70, 96 ("difficulties caused by evolving technologies and scientific protocols do not justify a lead agency's failure to meet its responsibilities under CEQA . . . "). Moreover, as we explained in our letter on the LAMP DEIR, other agencies have been able to evaluate their projects' consistency with the Executive Orders:

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> The SANDAG RTP/SCS EIR evaluated that project's impacts by calculating a 40 percent and 80 percent reduction from the region's 1990 emissions and using those figures as a target reference point for the RTP. It then compared the region's expected GHG emissions in the years 2035 and 2050 to the emissions necessary to meet the Executive Orders' trajectories. It included charts showing that the Plan would not come close to meeting the Executive Orders' goals. The SANDAG RTP/SCS EIR evaluated that project's impacts by calculating a 40 percent and 80 percent reduction from the region's 1990 emissions and using those figures as a target reference point for the RTP. It then compared the region's expected GHG emissions in the years 2035 and 2050 to the emissions necessary to meet the Executive Orders' trajectories. It included charts showing that the Plan would not come close to meeting the Executive Orders' goals.

See El Segundo Comments on LAMP DEIR at 32.

Finally, the DEIR asserts that the Project's emissions would be less than the SCAQMD's threshold of significance which is intended to achieve the level of GHG

reductions set forth in EO S-3-05 which in turn would achieve the GHG reduction goal of AB 32. DEIR at 4.2-20. The DEIR provides no evidence to support the assertion that the SCAQMD's thresholds of significance are intended to achieve the level of GHG reductions set forth in EO S-3-05. Moreover, as the LAMP DEIR explains, the SCAQMD's thresholds are intended only to apply to projects whether the SCAQMD is the lead agency. LAMP DEIR (attached as Exhibit O) at 4.5-16. The SCAQMD has not adopted guidance for CEQA projects under other lead agencies. *Id.*

The EIR should be revised to provide a legally defensible analysis of the Project's GHG impacts. This revised analysis must include an evaluation of the Project's consistency with regional and state plans adopted for the purpose of reducing GHG emissions.

VI. The DEIR Should Include Analysis of an Alternative That Does not Change the Number or Configuration of Passenger Gates.

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Because a legally adequate analysis of the impacts of additional aircraft operations caused by the Project would show noise, air quality and climate change impacts, LAWA should analyze an alternative whereby the major renovation aspects of the proposed Project would proceed without adding additional or reconfigured passenger gates to either terminal. Once LAWA revises the DEIR consistent with the comments in this letter, thereby providing the legally required disclosure of environmental impacts associated with the Project, it will become clear that the Project would have substantially greater environmental impacts (particularly to air quality, climate change and noise) than the DEIR currently anticipates. To address this, LAWA should evaluate a "no new gates" alternative that would not constrain present operations but nonetheless would help ensure the Project does not result in additional aircraft operations.

VII. If LAWA Refuses to Analyze the Growth-Inducing Impact of Individual Development Projects, Including this Project, LAWA Must Update the Master Plan and Its Associated EIR.

Tellingly, the DEIR makes little mention of the 2004 LAX Master Plan, in particular the extent to which the Project is consistent with that guiding plan for airport development. LAWA may not pursue a major Project such as this wholly separate from the LAX Master Plan (as amended by SPAS), which remain the governing planning documents for the airport. The Master Plan is *the* "modernization plan" that accounts for all growth at LAX, including improving the level of passenger service throughout the CTA and building new aircraft parking gates. *See generally* Master Plan Executive Summary. LAWA should present a clear side-by-side comparison of the Project and the

programmatic concepts in the LAX Master Plan and SPAS to detail similarities and differences.

Furthermore, for reasons explained in El Segundo's comments on the LAMP DEIR and FEIR, LAWA must update its 2004 LAX Master Plan and the associated environmental analysis because many of its planning assumptions, and much of the associated environmental analysis, are now inaccurate and insufficient. LAWA's refusal to acknowledge case-by-case the relationship of this Project, the LAMP, or other projects on the horizon to LAWA's ability to accommodate passenger capacity as forecasted in SCAG's 2040 RTP makes updating the Master Plan all the more critical and timely.

The Master Plan process was the last time, and to El Segundo's knowledge the *only* time, that LAWA has done a comprehensive, program-level environmental analysis of its long-term planning vision for LAX. While LAWA's vision in the Master Plan and associated EIR assumed a maximum practical passenger capacity at LAX of 78.9 MAP, the Project will play a central role in replacing this vision with one defined by unconstrained growth and disregard for regionalization. Without a "top-tier" document analyzing the impacts of passenger and aircraft operations at a maximum capacity of 96.6 MAP—and without such analysis in individual project EIRs like this one—no analysis exists on which LAWA can even purport to rely to back up its claims that its actions have no effect on LAX's ability to meet forecasted capacity. Without a comprehensive Master Plan update and new environmental analysis, LAWA's sole recourse is a full impact analysis, including analysis of cumulative impacts of all present, past, and reasonably foreseeable future projects, of individual projects' growth-inducing impacts.

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VIII. Conclusion

In sum, LAWA should take no action to approve the Project until it has addressed the significant deficiencies in the DEIR and the recommendations discussed in this letter.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Osa L. Wolff

Laurel L. Impett, AICP, Urban Planner

Joseph D. Petta

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Exhibits

Due to size limits, all exhibits are provided on CD delivered via FedEx. Additionally, Exhibits I and L are attached hereto.

A	Southern California Association of Governments 2040 Regional Transportation Plan / Sustainable Communities Strategy, Aviation Appendix
B	El Segundo's April 6, 2017 Request under the California Public Records Act
C	El Segundo's November 15, 2016 Comments on the LAX Landside Access Modernization Program ("LAMP") DEIR
D	El Segundo's March 1, 2017 Comments on the LAMP FEIR
E	CEQA documents for LAX Specific Plan Amendment Study
F	CEQA documents for LAX Master Plan
G	Delta Lease Materials
H	Selected news articles re Delta lease and Terminals 2 and 3 expansion project
I	Report of Dr. Adib Kanafani, Ph.D., NAE
J	2014 Annual Progress Report, LAX Master Plan Mitigation Monitoring & Reporting Program
K	Final LAX Noise Exposure Map Report (August 2015)
L	Letter from N. Liddicoat, MRO Engineers, to L. Impett, March 29, 2017
M	"Report: LAX Traffic Could be Getting a Whole Lot Worse," E. Chiland, Curbed Los Angeles, March 10, 2016
N	"Construction at LaGuardia Airport Causing Gridlock, Traffic Nightmares," J. Einiger, ABC News, August 23, 2016
O	LAMP DEIR and FEIR

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EXHIBIT I

Comments on the Draft Environmental Impact Report (DEIR) for the LAX Terminals 2 & 3 Modernization Project

In general, this may be a good project for improving the level of service at LAX. It would be a shame if LAWA, or its consultants, turns this Project into a contentious enterprise by not performing a thorough environmental impact analysis and identifying ways to mitigate any negative impacts that could arise.

The Project will add 3 gates but LAWA insists that this will not "cause or facilitate increases or decreases" in operations and passenger volumes (see section 2.6 of the DEIR). Whether it is part of this Project or not, "re-gauging" gates will create additional gate positions and result in increased capacity to handle aircraft operations or passenger flows. Simply to say that it would not is insufficient.

The EIR needs to include a capacity analysis to demonstrate this. LAWA must analyze the reconfigured apron with the additional gates in comparison to the existing layout, both done using the same current information and assumptions regarding aircraft sizes, fleet mixes, load factors, and all the "market" issues referenced in section 2.6 of the DEIR. To quote from the NCHRP Report referenced in section 2.6:

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> *The number of seats in each ADG can vary considerably from the basic definitions. For example, larger regional jets in Group III can be in the 100- to 110-seat range, while a Group III A321 narrowbody can have over 180 seats. Similarly, as fuel economy and range become more important, most widebody aircraft are being designed with wider wingspans in Group V but may have seating capacities in the low 200s. For a given airport, it may be appropriate to modify the EQA metrics to better match the fleet mix expected when using EQA to determine some terminal facilities.*

Thus the capacity analysis must explain how the additional 3 gates would not facilitate or generate additional traffic and operations. The analysis must also show how this re-gauging to add 3 gates could be done without changing the Narrow Body Equivalent Gate ("NBEG") numbers discussed in section 2.6.

In conclusion, a solid EIR is not complete without a capacity analysis of the reconfigured apron with the additional 3 gates. This may be a good project overall, but it is being spoiled by stating off-hand that it has no impact on apron/gate capacity, instead of performing the analysis transparently.

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 J

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March 29, 2017

Ms. Laurel L. Impett, AICP
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, California 94102

Subject: ***Review of Transportation/Traffic Analysis***
Draft Environmental Impact Report
Los Angeles International Airport (LAX) Terminals 2 and 3 Modernization Project
Los Angeles, California

Dear Ms. Impett:

As requested, MRO Engineers, Inc., (MRO) has reviewed the "Construction Surface Transportation" section of the Draft Environmental Impact Report (DEIR) for the Los Angeles International Airport (LAX) Terminals 2 and 3 Modernization Project (City of Los Angeles, February 2017). That section of the DEIR is based on a traffic impact analysis prepared by Ricondo & Associates (Ricondo) in January 2017.

Our review focused on the technical adequacy of the analysis, including the detailed procedures and conclusions documented in the Ricondo study.

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Construction Surface Transportation Analysis Review

Our review of the DEIR "Construction Surface Transportation" analysis revealed potentially significant deficiencies that should be addressed prior to approval of the project and its related environmental documentation by the City of Los Angeles. These issues are summarized below.

1. ***Inadequate Study Area*** – The construction traffic analysis study area is described at DEIR p. 4.4-3:

> *The construction traffic study area includes intersections and roadways that would be directly or indirectly affected by the construction of the proposed project. . . . The construction traffic study area for this analysis includes those roads and intersections that would most likely be used by employee and truck traffic associated with construction of the proposed project.*

In reality, though, the study area, as illustrated at DEIR Figure 4.4-1 (DEIR p. 4.4-2), barely extends beyond the boundaries of LAX, which inappropriately suggests that only an insignificant amount of the construction traffic will travel east of La Cienega Boulevard, south of Imperial Highway or Interstate 105, or north of Westchester Parkway or Howard Hughes Parkway. Moreover, even within this limited study area, a number of intersections are ignored that should be analyzed.

In particular, we reference the following locations that were evaluated in the recent DEIR for the Los Angeles International Airport (LAX) Landside Access Modernization Program (Los Angeles World Airports, September 2016), but are absent from the Ricondo analysis:

- Sepulveda Boulevard & I-105 Westbound Ramps,
- Sepulveda Boulevard & Mariposa Avenue,
- Sepulveda Boulevard & Grand Avenue,
- Sepulveda Boulevard & El Segundo Boulevard,
- Sepulveda Boulevard & Rosecrans Avenue,
- Avion Drive & Century Boulevard,
- Airport Boulevard & Century Boulevard,
- Nash Street & El Segundo Boulevard,
- Douglas Street & El Segundo Boulevard,
- Bellanca Avenue & Century Boulevard,
- Aviation Boulevard & West 120th Street,
- Aviation Boulevard & El Segundo Boulevard,
- Concourse Way & Century Boulevard,
- La Cienega Boulevard & West 120th Street,
- La Cienega Boulevard & El Segundo Boulevard,
- El Segundo Boulevard & I-405 Northbound Ramps, and
- Inglewood Avenue & Imperial Highway.

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Each of those intersections is in close proximity to one or more of the study intersections addressed in the Ricondo analysis. Consequently, it is reasonable to conclude that they would also, ". . . be directly or indirectly affected by the construction of the proposed project."

To ensure that the traffic analysis for the Terminals 2 and 3 Modernization Project is not only thorough but credible, the intersections listed above should be incorporated into the analysis. A revised DEIR should then be circulated for further public comment.

2. ***Traffic Volume Data***– DEIR p. 4.4-3 states that the intersection turning movement traffic volume counts employed in the analysis:

> *. . . were collected at key traffic study area intersections over a two-year period (2013 to 2015) from 7:00 a.m. to 9:00 a.m., and from 4:00 p.m. to 6:00 p.m.*

There are two issues with this description of the traffic volume data, both of which relate to conformance with requirements of the City of Los Angeles Department of Transportation (LADOT). The specific requirements governing the conduct of traffic impact analysis in the City of Los Angeles are presented in a document entitled, *Traffic Study Policies and Procedures* (August 2014). Page 7 of the document states:

> *When collecting turning movement data at the study intersections, manual traffic volume counts should be collected in 15-minute intervals during the hours of 7:00 a.m. to 10:00 a.m. and 3:00 p.m. to 6:00 p.m., unless LADOT specifies other hours*

. . . The traffic study should not use any traffic counts that are more than two years old.

Thus, the two-hour counts (7:00 – 9:00 AM and 4:00 – 6:00 PM) performed in conjunction with the Ricondo analysis are deficient with respect to the LADOT requirement for consideration of three-hour peak periods (7:00 – 10:00 AM and 3:00 – 6:00 PM). Consequently, it is not certain that the Ricondo analysis has actually addressed the AM and PM peak hours within the study area, although it is certain that the counts described violate the pertinent LADOT policy.

Moreover, any data collected in 2013 and some data collected in 2014 would exceed the two-year age limitation imposed by LADOT. The Notice of Preparation for the LAX Terminals 2 and 3 Modernization Project was issued on August 11, 2016. Thus, any data collected prior to August 11, 2014 would violate the LADOT policy. (In contrast, DEIR p. 4.4-4 refers to the "time of the analysis" as November 2016, which would suggest that the earliest acceptable data would be from November 2014.)

The traffic count data employed in the Ricondo analysis is not included in the DEIR or its appendices. However, assuming that the data used in the Ricondo analysis is the same data that was used in the September 2016 LAX Landside Access Modernization Program DEIR, the traffic counts for the following study intersections were performed on October 8, 2013: 4-7 Cont'd

- Sepulveda Boulevard & 76th/77th Street,
- Sepulveda Boulevard & 79th/80th Street, and
- Sepulveda Boulevard & 83rd Street.

In addition, counts at nine study intersections were performed on July 23rd or 24th of 2014, which would also violate the LADOT requirement, based on both the NOP issue date and the "time of analysis" date. Those intersections are as follows:

- Aviation Boulevard & Century Boulevard (July 23, 2014),
- Imperial Highway & Aviation Boulevard (July 24, 2014),
- Aviation Boulevard & 111th Street (July 24, 2014),
- Sepulveda Boulevard & Century Boulevard (July 23, 2014),
- Imperial Highway & Sepulveda Boulevard (July 24, 2014),
- Imperial Highway & I-105 Ramp (July 24, 2014),
- Sepulveda Boulevard & La Tijera Boulevard (July 24, 2014),
- Sepulveda Boulevard & Lincoln Boulevard (July 24, 2014), and
- Sepulveda Boulevard & Manchester Avenue (July 24, 2014).

In summary, some or all of the traffic volume data employed in the Ricondo analysis violates the basic governing LADOT requirements. To ensure conformance with LADOT requirements, new data will be required. It will then be necessary to revise the traffic analysis and present the results in revised DEIR.

3. ***Peak-Hour Analysis Periods*** – The analysis time periods are presented at DEIR p. 4.4-4 and p. 4.4-8. According to the DEIR:

> *The estimated peak hours for construction-related traffic were determined by reviewing the estimated hourly construction-related trip activity for the proposed project developed for this study. The a.m. peak hour was determined to be 7:00 a.m. to 8:00 a.m. and the p.m. peak hour was determined to be 4:00 p.m. to 5:00 p.m.* [DEIR p. 4.4-4]

The estimated hourly construction-related travel patterns are documented at DEIR Table 4.4-4 (p. 4.4-17 & 4.4-18). As indicated in the DEIR, the highest level of construction-related traffic in the morning will occur between 7:00 and 8:00 AM; this corresponds to the AM peak hour analyzed in the Ricondo study.

In the afternoon, though, DEIR Table 4.4-4 shows that the highest level of construction traffic will occur between 3:00 and 4:00 PM. During that one-hour time period, 211 trips will be generated by project construction activities. The DEIR, however, analyzed the following hour – 4:00 to 5:00 PM – when only 30 construction-related trips are projected to occur. Of course, as noted above, the traffic volume data used in the analysis did not include the 3:00 – 4:00 PM hour, in violation of LADOT requirements.

Consequently, the analysis of PM peak hour conditions documented in the DEIR is deficient, in that it fails to address the actual peak period of construction-related traffic demand occurring within the LADOT-required three-hour PM peak period. Instead, the DEIR addresses a PM time period when project-related construction traffic will be 14 percent of the peak level. 4-7 Cont'd

This is obviously a substantial deficiency in the analysis, which must be rectified in combination with collection of new traffic data, as described above.

4. ***Inadequate Haul Route Analysis*** – The DEIR identifies the proposed construction vehicle routes on p. 4.4-18 and on Figure 4.4-3 (DEIR p. 4.4-20). Among the roads to be substantially affected is West Imperial Highway along the northern edge of the City of El Segundo. In fact, DEIR Figure 4.4-3 (DEIR p. 4.4-20) appears to indicate that as many as 67 percent of the project-related trucks would use West Imperial Highway, as follows:

   - 32 percent regional trips to/from the east on I-105;
   - 23 percent regional trips to/from the south on I-405;
   - 5 percent local trips to/from the east on West Imperial Highway;
   - 5 percent local trips to/from the south on Sepulveda Boulevard; and
   - 2 percent local trips to/from the south on Aviation Boulevard.

DEIR Table 4.4-4 (DEIR pp. 4.4-17 - 4.4-18) shows that a total of 360 passenger-car-equivalent truck trips per day are estimated, based on application of a "passenger car equivalent" (PCE) factor of 2.5 for trucks; that is, one truck is equivalent to 2.5 passenger cars, in terms of its effect on the roadway system. (DEIR p. 4.4-16) If 67 percent of those trips are on West Imperial Highway, an additional 240 PCE truck trips will occur there each day throughout the course of the more than six-year construction period.

The DEIR largely ignores the effects of trucks on West Imperial Highway and other affected roads, however. Trucks have an inordinate adverse effect on traffic operations and safety, due to their size and operating characteristics, particularly with regard to slower acceleration, longer braking distances, and the need for greater separation between vehicles. Key concerns that were not addressed in the DEIR include:

A. Safety – The traffic study includes no discussion or analysis of auto-truck conflicts and the potential safety issues associated with mixing automobile traffic with a substantially increased volume of heavy-vehicle traffic.

B. Pavement Condition – The addition of substantial volumes of heavy trucks will take a toll on the condition of the pavement on West Imperial Highway and the other haul routes. A mitigation measure must be identified to address this issue, particularly calling for reimbursement of the additional costs incurred by the City of El Segundo to maintain this critical roadway in acceptable condition.

C. Cumulative Effects of Truck Traffic – The DEIR notes that a number of other projects are currently being considered at LAX. DEIR Table 4.4-6 (DEIR p. 4.4-24) lists eight other LAX projects that are anticipated to be under construction in November 2019 (i.e., the "overall cumulative peak" construction period), including the following:

- Midfield Satellite Concourse North,
- Miscellaneous Projects/Improvements,
- LAX Northside Development Area Project,
- Airport Metro Connector 96th Street Transit Station,
- Airport Security Buildings,
- Landside Access Modernization Program,
- Concourse 0, and
- North Airfield Improvements Project.

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In addition, DEIR Table 4.4-5 (DEIR p. 4.4-21) lists thirteen more LAX-area projects (for a total of 21) that will be under construction during some or all of the six-year-plus construction period for the proposed project. And, of course, DEIR Table 3-2 (DEIR pp. 3-9 – 3-17) lists a total of 212 "LAX Area Probable Development Projects." Thus, up to 233 development projects are anticipated in or near the study area, each of which will generate truck traffic during its construction period. (As will be discussed later, all but the above-listed eight projects were inappropriately ignored in all aspects of the DEIR traffic analysis.)

Each of the projects described above will generate substantial truck volumes during construction. For example, the Landside Access Modernization Program, which is also currently under environmental review, is estimated to generate 1,944 PCE truck trips each day on the same roads that will be affected by the proposed Terminals 2 and 3 project. (Reference: Los Angeles World Airports, *Draft Environmental Impact Report for Los Angeles International Airport (LAX) Landside Access Modernization Program*, September

2016, Table 4.12.3-4, p. 4.12-215.) If 67 percent of those trips use West Imperial Highway, 1,300 PCE truck trips will be added to that road each day.

As another example, the LAX Northside Development Area Project will generate 238 daily truck trips. (Reference: Gibson Transportation Consulting, Inc., *Transportation Study for the LAX Northside Plan Update*, May 2014, p. 269.) Those truck trips will be equivalent to about 600 passenger car trips.

Further, detailed review of DEIR Table 4.4-6 raises questions regarding the accuracy of the truck trip numbers presented there. Specifically, Footnote 3 to that table indicates that the truck trip estimates have been adjusted using a PCE factor of 2.5. If that were the case, the smallest number that could appear in the columns indicating truck trips would be 3 (i.e., 1 truck * 2.5 = 2.5 PCE, which would round up to 3). However, two of the projects are shown to have only one PCE trip in each direction in both the AM and PM peak hours (Miscellaneous Projects/Improvements and North Airfield Improvements).

In addition, application of the 2.5 PCE factor should mean that each truck trip value presented in the table would be a multiple of 2.5 (with appropriate consideration of rounding). However, that is not the case. For example, the Landside Access Modernization Program is shown to have 71 PCE truck trips in each direction in both peak hours. Seventy-one PCE divided by 2.5 indicates 28.4 truck trips. To test whether this is simply a result of round-off error, we multiplied 28 trucks by 2.5 and got 70 PCE truck trips. We then multiplied 29 trucks by 2.5 and got 72.5, which would round to 73. In short, there is no number of truck trips that can be multiplied by 2.5 and get a result of 71 PCE trips.

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Similarly, the Airport Security Buildings project is shown to have 6 PCE trips in each direction in both the AM and PM peak hours. Obviously, 6 is not a multiple of 2.5, and no calculation would round-off to 6. Only PCE values of 5 or 8 (i.e., 7.5 rounded up) make sense in this case.

In summary, substantial additional truck travel will occur in the study area in conjunction with the proposed Terminals 2 and 3 Modernization Project as well as a number of other LAX-area projects. As noted above, only 8 of the 233 LAX-area development projects identified in the DEIR were considered in the traffic analysis, even though all of them will generate truck traffic during their respective construction periods. Despite this, the potential cumulative impacts relating to truck-related safety and pavement condition in the study area have been ignored in the DEIR. Furthermore, the estimated number of PCE trips employed in the cumulative conditions intersection level of service analyses appears to be incorrect.

5. ***Baseline Traffic Volumes*** – With regard to determination of "baseline" traffic conditions, DEIR p. 4.4-4 says:

> *Baseline conditions used in the analysis of project-related construction traffic impacts are defined as the existing conditions within the construction traffic study area at the time of the analysis (November 2016). Intersection turning movement volumes were collected over a two-year period (2013 to 2015), representing the most current comprehensive traffic counts completed by LAWA* [Los Angeles World Airports]. *Additionally, LAWA conducts annual driveway volume counts at various locations throughout the Airport . . . Furthermore, LAWA collects annual traffic volume counts each August along the CTA* [Central Terminal Area] *roadways to*

> *estimate annual growth in Airport traffic. . . . Consequently, both the driveway count data and CTA data were used to establish a growth rate to adjust the 2015 traffic volumes to 2016 levels. . . . The a.m. traffic volumes were increased by 12.1 percent, while the p.m. traffic volumes were increased by 11.2 percent. These volumes were used as a basis for preparing the construction traffic analysis and assessing project-related construction traffic impacts.*

First, we note that 2013 – 2015 is actually a three-year period (2013, 2014, and 2015), rather than a two-year period, as described in the DEIR.

We also note that, while the DEIR describes how counts from 2015 were adjusted to represent baseline (2016) conditions, no corresponding description is provided with respect to adjustment of traffic volumes from 2013 or 2014. Treating the percentages described above as average (i.e., uncompounded) growth rates would suggest that a 2013 AM peak-hour traffic volume would need to be increased by 36.3 percent to estimate a 2016 value (i.e., three years at 12.1 percent per year), and a 2013 PM peak-hour count would be increased by 33.6 percent (i.e., three years at 11.2 percent per year). For 2014 counts, the growth factors would be 24.2 percent and 22.4 percent for the AM and PM peak hours, respectively. Were these equivalent annual growth factors applied to the older counts? If not, why not?

6. ***Future Cumulative Traffic Volumes*** – Development of the cumulative (November 2019) traffic volumes is described at DEIR p. 4.4-6 and, in more detail, beginning at DEIR p. 4.4-19. In summary, that process involved application of a two percent per year growth factor, in combination with the traffic associated with eight other planned projects that are expected to be under construction in November 2019. 4-7 Cont'd

   Specifically, DEIR p. 4.4-6 states:

   > *. . . background traffic was increased to reflect additional growth from non-specific projects, which may include both Airport and non-Airport related projects. The construction traffic analysis assumed a two percent annual growth in background traffic which produces a conservative traffic volume scenario that would account for additional construction-related traffic in the event that additional construction projects are initiated during the timeframe evaluated for this study.*

   Obviously, the two percent per year growth factor employed in this process varies substantially from the 12.1 percent and 11.2 percent growth factors that were used to develop the baseline traffic volumes. As described above, the larger percentages were based directly on data collected at and near LAX. On the other hand, the two percent per year value was apparently used simply because it is, ". . . consistent with previous direction first provided by LADOT for use in the SAIP construction traffic analysis . . ." (DEIR p. 4.4-6) SAIP refers to the South Airfield Improvement Project, which was the subject of an environmental impact report prepared in October 2005, over 11 years ago. Clearly, to develop a truly "conservative traffic volume scenario," it is appropriate to use the more recent and more relevant LAX-area growth factors described above in place of the historical two percent value.

   In addition to the inadequate two percent per year growth factor, the analysis incorporates estimated traffic volumes for eight concurrent LAX construction projects, which are listed in DEIR Table 4.4-6 (DEIR p. 4.4-24). That is, the DEIR considers only LAX-area related projects that are expected to be under construction at the same time as the proposed Terminals

2 and 3 Modernization Project; it ignores any related projects that might generate non-construction-related traffic in the study area, including a number of the 29 projects listed in DEIR Table 3-1 (DEIR pp. 3-4 – 3-7), which lists "Development Projects At/Adjacent to LAX."

Moreover, DEIR Table 3-2 (DEIR pp. 3-9 – 3-17) presents a list of 212 "probable" development projects that were ignored in the traffic analysis. That list includes projects in the Cities of Los Angeles, Culver City, El Segundo, Manhattan Beach, Lawndale, Inglewood, Hawthorne, and the County of Los Angeles. It seems obvious that consideration of only the projects listed in DEIR Table 4.4-6 (DEIR pp. 4.4-24) in combination with the two percent annual growth factor is inadequate to provide a reasonable estimate of cumulative traffic volumes during the construction period for the proposed project.

In summary, the cumulative traffic volumes employed in the analysis are deficient in that they:

- Are based, in part, on a growth factor that fails to accurately reflect the recent level of traffic growth in the vicinity of LAX, as documented in the traffic study;
- Account for only construction-related traffic associated with a selected list of eight related projects "at/adjacent to" LAX;
- Are the result of inaccurate conversion of truck trips to PCE trips, as described above,)
- Totally ignore non-construction-related traffic from any other projects, including the 212 "probable" projects listed in the DEIR.

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Consequently, the cumulative traffic analysis documented in the DEIR fails to adequately or accurately evaluate the potential impacts of the proposed project. The analysis must be revised to incorporate accurate estimates of future traffic volumes in the study area.

7. ***Fuel Consumption Estimates*** – Construction-related fuel consumption associated with the proposed project is estimated beginning at DEIR p. 6-4. Three tables are presented there, as follows:

   - Table 6-1: Construction Worker Gasoline Demand (DEIR p. 6-5),
   - Table 6-2: Construction Off-Site Deliveries and Hauling Demand (DEIR p. 6-6), and
   - Table 6-3: Construction On-Site Deliveries and Hauling Demand (DEIR p. 6-6).

   In each case, fuel consumption was estimated from total estimated carbon dioxide emissions using a designated conversion factor for either gasoline or diesel fuel. To check the reasonableness of the fuel consumption estimates, we have performed an additional step, in which we derived the fuel economy values (in terms of miles per gallon or MPG) associated with the information presented in the three tables. That process involved first deriving values for "total miles traveled" by multiplying the number of trips by the trip length. The fuel economy values were then derived by dividing that total miles traveled value by the number of gallons of fuel presented in each table. Tables 1 – 3 summarize that information.

Table 1 summarizes the gasoline consumption figures related to construction worker travel. As shown, the fuel economy values vary substantially by phase, from as low as 0.85 MPG to as high as 12.57 MPG. Overall, a fuel economy value of 2.00 MPG was derived from the information in DEIR Table 6-1.

Table 1
Construction Worker Gasoline Demand[1]

Phase	Trips	Trip Length (Miles)	Total Miles Traveled[2]	Gallons of Gasoline	Miles Per Gallon[3]
Airside Civil/Apron Work	5,186	40	207,440	16,498	12.57
Terminal 3BHS Sprung Building	310	40	12,400	5,050	2.46
Terminal 3 Concourse	7,166	40	286,640	71,829	3.99
Terminal 2& 3 Headhouse	5,267	40	210,680	246,465	0.85
Terminal 2 Concourse	5,785	40	231,400	93,603	2.47
Terminal 3 North (Satellite)	1,984	40	79,360	43,322	1.83
Terminal 3.5 Headhouse	3,705	40	148,200	112,458	1.32
TOTAL	29,403	40	1,176,120	589,225	2.00

Notes:
[1] Source: DEIR, Table 6-1: Construction Worker Gasoline Demand, p. 6-5.
[2] Derived by multiplying "Trips" by "Trip Length"
[3] Derived by dividing "Total Miles Traveled" by "Gallons of Gasoline"

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Table 2 presents similar information for Construction Off-Site Deliveries and Hauling Demand, based on diesel consumption data presented in DEIR Table 6-2. Substantial variation is again shown for the various phases of construction activity, with fuel economy values ranging from 5.92 MPG to 34.38 MPG, with an overall value of 26.29 MPG.

Table 2
Construction Off-Site Deliveries and Hauling Demand[1]

Phase	Trips	Trip Length (Miles)	Total Miles Traveled[2]	Gallons of Diesel	Miles Per Gallon[3]
Airside Civil/Apron Work	42,931	40	1,717,240	49,951	34.38
Terminal 3BHS Sprung Building	50	40	2,000	296	6.76
Terminal 3 Concourse	1,665	40	66,600	4,828	13.79
Terminal 2& 3 Headhouse	4,496	40	179,840	15,074	11.93
Terminal 2 Concourse	175	40	7,000	1,182	5.92
Terminal 3 North (Satellite)	340	40	13,600	2,069	6.57
Terminal 3.5 Headhouse	1,426	40	57,040	4,335	13.16
TOTAL	51,083	40	2,043,320	77,735	26.29

Notes:
[1] Source: DEIR, Table 6-2: Construction Off-Site Deliveries and Hauling Demand, p. 6-6.
[2] Derived by multiplying "Trips" by "Trip Length"
[3] Derived by dividing "Total Miles Traveled" by "Gallons of Diesel"

4-7
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Finally, Table 3 presents the derivation of the diesel fuel economy estimates for Construction On-Site Deliveries and Hauling Demand. In this case, the trip length is somewhat shorter than was indicated in the two tables above, because of the nature of "on-site" travel. This table indicates substantially less fuel economy variation among the construction phases, with a range of 6.62 to 9.76 MPG and an overall value of 6.77 MPG.

Table 3
Construction On-Site Deliveries and Hauling Demand[1]

Phase	Trips	Trip Length (Miles)	Total Miles Traveled[2]	Gallons of Diesel	Miles Per Gallon[3]
Airside Civil/Apron Work	42,931	16.5	708,362	106,995	6.62
Terminal 3BHS Sprung Building	50	16.5	825	99	8.33
Terminal 3 Concourse	1,665	16.5	27,473	3,645	7.54
Terminal 2& 3 Headhouse	4,496	16.5	74,184	9,852	7.53
Terminal 2 Concourse	175	16.5	2,888	296	9.76
Terminal 3 North (Satellite)	340	16.5	5,610	690	8.13
Terminal 3.5 Headhouse	1,426	16.5	23,529	2,857	8.24
TOTAL	51,083	16.5	842,870	124,434	6.77

Notes:
[1] Source: DEIR, Table 6-3: Construction On-Site Deliveries and Hauling Demand, p. 6-5.
[2] Derived by multiplying "Trips" by "Trip Length"
[3] Derived by dividing "Total Miles Traveled" by "Gallons of Diesel"

4-7 Cont'd

In each of the three cases, it is unclear why the fuel economy values form each phase should vary to such a large degree. A single fuel-specific factor was used to convert the carbon dioxide emissions estimates to gallons of either gasoline or diesel fuel. This would suggest uniformity among the derived values, but that is not the case. Moreover, the derived fuel economy values do not all appear to be reasonable. For example, the overall fuel economy figure for construction worker trips is 2.00 MPG, with all but one of the individual phase values being less than 4.00 MPG.

The process used to derive the fuel consumption estimates must be reviewed. If that process reveals that the results are inaccurate, revised figures must be provided for public review. At a minimum, a better explanation must be provided with respect to derivation of the fuel consumption values presented in DEIR Tables 6-1 through 6-3.

CONCLUSION

Our review of the "Construction Surface Transportation" section of the Draft Environmental Impact Report for the LAX Terminals 2 and 3 Modernization Project in Los Angeles, California revealed several substantial issues the affecting validity of the conclusions presented in that document. A modified traffic analysis must be prepared, and that updated analysis should be incorporated into a revised environmental document.

We hope this information is useful. If you have questions concerning anything presented here, please feel free to contact me at (916) 783-3838.

Sincerely,

MRO ENGINEERS, INC.

Neal K. Liddicoat, P.E.
Traffic Engineering Manager

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Comment Letter 4: Shute, Mihaly & Weinberger LLP (City of El Segundo)

Response 4-1:

This comment includes introductory remarks, including a summary of comments on the Draft IS/ND for the proposed project contained in the comment letter, as well as comments made on other LAWA projects. The commenter also provides a summary of the project objectives and construction schedule as provided in the IS/ND. No further response to this comment is required.

Response 4-2:

The commenter asserts that the replacement of the existing bus gate with a new bus gate and the gate reconfiguration at T6 to 15 total gates would increase capacity at LAX. However, the proposed renovation of T6 would not induce additional operations; rather, the improvements would meet existing needs to improve aircraft operational efficiency, passenger level of service, and accommodate the aircraft fleet currently operating at T6. If, as a component of the renovation project, the T6 gates are not reconfigured, the airlines operating at T6 would need to operate out of other gates, remote gates, or hardstands.

As discussed in Section 1.2, Project Location, Existing Facilities, on page 16 of the Draft IS/ND, T6 was originally built in 1959, with the most recent major structural improvement completed in 1982. Interior improvements within the last 10 years have included improvements to concessions spaces and concessions infrastructure, hold rooms, and operational space for passenger use. Aircraft operations at T6 have experienced ambient growth in the years since its construction, and the original design is no longer efficient to support current operations. The more recent interior improvements have provided for some interim improvements in passenger level of service; however, they have not addressed all of the inefficiencies present at T6 as outlined in the Draft IS/ND. Due to the inefficiencies of the current gate configurations, airlines operating at T6 must use remote gates and pads when no gates are available. This results in diminished level of service provided to passengers, as well as diminished efficiency of aviation operations. When flights are delayed due to the unavailability of gates, remote gates provide a means of deplaning passengers more immediately. However, the remote gates lack passenger services, seating areas, concessions and other amenities, such as restrooms. Having to bus passengers from remote gates to terminals further affects efficiency and level of service.

As discussed in Section 1.4, Project Description, page 23 of the IS/ND, proposed improvements to Level 2 – OPS/Apron Level include the replacement and consolidation of existing bus gate operations currently located between Gates 60 and 62. The replacement bus gate and associated boarding and de-boarding area will continue to support international and domestic departing and arriving flights in a consolidated location at Gate 66. Currently, in order to support domestic and international flights at T6, the existing bus operations at T6 are located both between Gates 60 and 62, as well as at temporary locations due to the existing gate configuration. The proposed renovation of T6 and gate and security reconfiguration will allow the consolidation of domestic and international busing in the proposed new location.

Further, the new bus gate will be connected to a modernized ADA facility including a new ADA ramp and larger and faster elevator that will enable a more reliable and secure system than the existing open ADA lift. The current ADA access is limited to an outdated lift that takes approximately 2-3 minutes to move one passenger at a time. This more reliable ADA functionality will serve both domestic and international passengers as part of the terminal renovation. The consolidation into one bus gate and the drive-forward bus loop is necessary for more efficient

passenger loading and unloading, with no additional bus gate operations. The commenter also states that the, "current configuration of LAX is a limiting factor on the total operations that can occur at LAX" and that, by adding passenger facilities and increasing its level of service, LAWA will attract more passengers to, and facilitate more operations at, LAX. The proposed project would not alter the existing airfield configuration, and thus, would have no effect on airfield (runway and taxiway) capacity. The proposed project would modify the configuration of T6 within the existing aircraft parking limit line and provide two additional gates for passenger boarding and de-boarding. As stated above, if the proposed project is not implemented, airlines operating at T6 must use remote gates and pads when no gates are available. This would result in diminished level of service provided to passengers, as well as inefficiencies in aviation operations and airfield congestion (e.g., increase in aircraft towing operations and additional busing operations).

The terminal gate component is only one component of the overall airport system, which includes the airfield component (runway and taxiway system), and landside component (access road system and curbside).[1] Each component has its own operational characteristics, limitations, and resulting potential constraints. The theoretical physical throughput capacity of any individual component of an airport system does not set the overall airport capacity.[2] Even if, hypothetically, adding two aircraft passenger gates could allow more passengers to access the Airport, the theoretical physical capacity of the Airport and actual passenger growth would still be determined by how all of the individual components of the airport system function together and by the limitations of any components. The 2016-2040 Regional Transportation Plan published by SCAG identifies the airfield as the limiting factor of capacity at LAX, based on the existing runway configuration. The proposed T6 Renovation Project would not affect or change any airfield components, including the runways, taxiways, taxilanes, or aircraft arrival and departure procedures, and thus would not increase the overall capacity of LAX.

Similar to the discussion above regarding operational changes resulting from ambient growth, aircraft sizes have also changed in the years since the original design and construction of T6. As such, it is reasonable that airports would periodically need to realign gates around a terminal to accommodate changes in aircraft sizes. As discussed in Section 1.3, Project Objectives, on page 19 of the IS/ND, the proposed project would realign the existing gates at T6 to accommodate existing and forecasted aircraft fleet models. Dimensional requirements for aircraft parking positions are further discussed on page 34 of the Draft IS/ND. As discussed on page 34, "aircraft parking limit lines are a key factor limiting the size and location of aircraft gates available at T6."

The dimensional requirements for aircraft parking positions are based on the type of aircraft the apron is designed to accommodate. The FAA has established dimensional requirements based on the Airplane Design Group (ADG) which relate to either the aircraft wingspan or tail height (physical characteristics), whichever is most restrictive to an aircraft's safe movement on the airport. FAA Advisory Circular 150/5300-13A also discusses wingtip and object clearance rules applying to taxiways, taxilanes and aprons. As further discussed on page 34, "the proposed new layout would accommodate the requirements for the fleet mix at T6 which primarily contains aircraft in ADG III, which includes aircraft with a wingspan of 79 - <118 feet. The passenger

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

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

terminal apron areas would not increase in size as part of the proposed project, as the surrounding aircraft parking limit lines would remain in their existing location. Similarly, the available terminal linear frontage would not increase as part of the proposed project." The realignment of the gates at T6 would accommodate the existing demand and fleet mix at the terminal, without changing the available apron area to improve passenger level of service. If the proposed project is not implemented, airlines operating at T6 must use remote gates and pads when no gates are available. Therefore, the reconfiguration proposed as part of the T6 Renovation project would not increase aircraft operations at LAX.

Response 4-3:

The commenter asserts that the proposed project would enable an increase in aircraft operations. The commenter is referred to Response 4-2 regarding the gate reconfiguration and bus gate replacement at T6 as part of the proposed project. As discussed, the gate reconfiguration would accommodate existing conditions resulting from ambient growth that has occurred in the years since the construction of T6, as well as forecasted ambient growth estimated to occur in the future. Additionally, the bus gate improvements would consolidate bus operations that currently occur between the gates at T6 and other gates, including remote gates.

Response 4-4:

The commenter states that the IS/ND ignores the cumulative impacts of the proposed project in connection with the effects of past, current, and future projects. While other projects are planned at LAX, similar to the proposed project, these projects are being implemented to accommodate existing demand. The proposed project impacts to air quality, greenhouse gas emissions, and noise would be temporary and short-term, occurring during the 36-month construction period. During construction, air quality and greenhouse gas emissions would be generated by construction trucks and equipment, and as shown in the air quality and greenhouse gas emissions impact analyses beginning on pages 44 and 58 of the IS/ND, respectively, emissions during construction would not exceed the established thresholds. Additionally, as discussed in the IS/ND, the proposed project would include upgrades that would improve building systems, and heating and cooling would be provided by LAWA's Central Utility Plant, which is designed for maximum efficiency. As such, the proposed project's operational emissions would be similar to or less than existing operations. As discussed in the noise impact analysis beginning on page 66 of the IS/ND, the construction activities would temporarily increase noise levels at the project; however, the nearest sensitive receptors are approximately 3,000 feet from the project site and the increase in noise levels would be below the 5-dBA threshold. As stated in response to Comment 4-2, the proposed project would not result in increased aircraft operations. As such, the proposed project would not result in permanent increases in noise. Even if other planned LAX projects resulted in impacts to air quality, greenhouse gas emissions, and noise, as discussed in the IS/ND, the proposed project would not generate net increases in these areas during operation and would not contribute to cumulatively considerable impacts.

The commenter states that the Airfield Terminal Modernization Project (ATMP) is not mentioned in the IS/ND. Although an Environmental Impact Report for the ATMP has not yet been released and is currently being prepared, the less than significant impacts from the T6 Renovation Project have no potential to combine with the anticipated impacts from ATMP to result in significant cumulative impacts. Therefore, the proposed project impacts cannot be compared to those of the ATMP. Accordingly, the ATMP is not mentioned in the IS/ND for the proposed project.

The commenter also asserts that the proposed project would increase passenger operations from the addition of new passenger gates and bus gate operations. The commenter is referred to Response 4-2 above regarding the gate reconfiguration and bus gate replacement at T6 as part of the proposed project. As discussed, the gate reconfiguration would accommodate existing demand that has increased in the years since the construction of T6; any future growth in operations would occur with or without the proposed project. Additionally, the bus gate improvements would consolidate bus operations that currently occur between the gates at T6 and other gates, including remote gates.

Response 4-5:

The commenter asserts that the proposed project would lead to increased passenger capacity/activity that will result in increased traffic, greenhouse gas, air quality, noise, and cumulative impacts. The commenter is referred to Response 4-2 above regarding implementation of the proposed project to accommodate existing demand. As previously discussed, operations at T6 have experienced increased growth in the years since construction of T6, and the original design is no longer efficient to support current operations. Similar aviation forecasts and projections are accounted for in regional planning documents related to traffic and associated air quality, greenhouse gas emissions, and noise impacts. This forecast traffic growth and its associated impacts would occur regardless of implementation of the proposed project. As the proposed project would meet existing needs at LAX, it would not contribute to a net increase in traffic, air quality, greenhouse gas emissions, or noise beyond those accounted for in regional growth projections. As such, the IS/ND concludes that the proposed project's impacts related to air quality, greenhouse gas emissions, noise, and traffic would be less than significant.

The commenter is referred to Response 4-4 regarding cumulative impacts.

Response 4-6:

The comment calls for the preparation of an EIR due to CEQA Guidelines 15064(f)(1). However, there is not substantial evidence, in light of the whole record, to support a fair argument that the project may result in significant impacts. On the contrary, the IS/ND concludes that the proposed project would not result in significant environmental impacts. Responses 4-1 through 4-5 regarding the analysis contained in the IS/ND related to operation of the proposed project support this conclusion and demonstrate that the commenter's opinion that the proposed Project could increase capacity is unfounded. (See *Citizen Action to Serve All Students v. Thornley* (1990) 222 Cal.App.3d 748, 756 [speculation or "unsubstantiated opinions, concerns, and suspicions" are not substantial evidence and cannot establish a "fair argument" that a significant impact may occur]; see also, *Leonoff v. Monterey County Board of Supervisors* (1990) 222 Cal.App.3d 1337, 1352.)

Response 4-7:

The commenter attaches a comment letter they submitted on the environmental document for a different LAWA project (T2/3 Modernization Project). The attachment is acknowledged for the record and will be forwarded to the decision-making bodies for their review and consideration. Responses to the Terminal 2/3 Modification Project can be found at https://www.lawa.org/en/lawa-our-lax/environmental-documents/documents-certified/lax-terminal-2-and-3-modernization.

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY Gavin Newsom, Governor

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Making Conservation a California Way of Life.

January 31, 2020

Kathline King
Los Angeles World Airports
Environmental Programs Group
6053 West Century Blvd, Suite 1050
Los Angeles, CA 90045

RE: Los Angeles International Airport (LAX)
Terminal 6 Renovation Project – Negative Declaration (ND)
GTS # 07-LA-2020-03136
Vic. LA-1/PM: 26.736

Dear Kathline King:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced ND. The proposed project includes improvements to the existing Terminal 6 (T6) Concourse, including airside improvements within the confines of the existing T6 apron. The project would be implemented on three levels of the existing four-story T6 Concourse, aircraft parking apron, hydrant fuel, and gate systems. The proposed improvements would enhance passenger experience, support safety and security, provide operational efficiency, improve building systems, and refresh portions of the terminal. The project is not expected to increase operational trips to LAX. Los Angeles World Airports is considered the Lead Agency under the California Environmental Quality Act.

The nearest State facilities to the proposed project are State Route 1 (SR-1) and Interstate 105 (I-105). SR-1 is located approximately 3,000 feet away from the project and I-105 is located approximately 1 mile away from the project. After reviewing the ND, Caltrans does not expect project approval to result in a direct adverse impact to existing State transportation facilities.

The following information is included for your consideration. Any transportation of heavy construction equipment and/or materials which requires use of oversized-transport vehicles on State highways will need a Caltrans transportation permit. We support equipment trucks traveling to and from the site outside of typical commuter peak periods. Caltrans also supports establishing "construction worker commute and shift times that avoid contributing to peak period traffic and moderate haul/delivery truck traffic" as stated in the ND. If construction traffic is expected to cause delays on state facilities, please submit a Construction Traffic Management Plan for Caltrans' review. This plan should include strategies to mitigate truck traffic. 5-1

If you have any questions about these comments, please contact Emily Gibson, the project coordinator, at Emily.Gibson@dot.ca.gov, and refer to GTS# 07-LA-2020-03136.

Sincerely,

MIYA EDMONSON
IGR/CEQA Branch Chief

"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Letter 5: California Department of Transportation, District 7

Response 5-1

The commenter affirms that the nearest state facilities, SR-1 and I-105, are approximately 3,000 feet from the project but that project approval would not directly adversely affect those existing transportation facilities. The equipment trucks traveling to and from the project site would be scheduled to avoid contributing to peak period traffic, as described in the IS/ND. As the commenter states, a Caltrans Transportation Permit would be sought for heavy construction equipment and/or materials which require use of oversized-transport vehicles on State highways. No further response to this comment is required.