

July 2020 |

Los Angeles International Airport

# Final Negative Declaration for the Los Angeles International Airport Terminal 4 Modernization Project

Prepared for:

Los Angeles World Airports

Prepared by:

## **RICONDO**

Ricondo & Associates, Inc. (Ricondo) prepared this document for the stated purposes as expressly set forth herein and for the sole use of Los Angeles World Airports and its intended recipients. The techniques and methodologies used in preparing this document are consistent with industry practices at the time of preparation and this Report should be read in its entirety for an understanding of the analysis, assumptions, and opinions presented. Ricondo & Associates, Inc. is not registered as a municipal advisor under Section 15B of the Securities Exchange Act of 1934 and does not provide financial advisory services within the meaning of such act.

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## 1. INTRODUCTION

The Notice of Intent to Adopt a Negative Declaration (NOI) for the Terminal 4 Modernization Project was posted at the office of the Los Angeles City Clerk on October 21, 2019 and the office of the Los Angeles County Clerk on December 11, 2019. In accordance with CEQA Statute and Guidelines Section 15072, the NOI for the proposed Project was mailed to 85 organizations, emailed to approximately 400 organizations and individuals, and mailed to 6,515 owners, occupants, and abutters potentially affected by or interested in the proposed Project. A notice regarding the Project was published in the *Los Angeles Times, The Argonaut*, and the *Daily Breeze* on October 24, 2019. Copies of the Initial Study/Proposed Negative Declaration (IS/ND) were available for review at the following libraries: (1) El Segundo Library: 111 West Mariposa Avenue, El Segundo, CA 902045; (2) Playa Vista Public Branch Library: 6400 Playa Vista Drive, Los Angeles, CA 90094; and (3) Westchester-Loyola Village Branch: 7114 W. Manchester Avenue, Los Angeles, CA 90045. The IS/ND was also available at the LAWA Administrative Office, located at 6053 Century Boulevard and posted online at LAWA's website, https://www.lawa.org/en/lawa-our-lax/environmental-documents/current-projects, under "Current Projects."

In accordance with CEQA Statute and Guideline Section 15073, a comment period of 20 days for the Initial Study and Proposed Negative Declaration began on October 24, 2019 and ended on November 13, 2019 following filing of the Document with the Los Angeles City Clerk. The Comment Period was re-opened for a 20-day period, beginning on December 11, 2019 and ending on December 30, 2019, following filing of the NOI with the Los Angeles County Clerk's Office. The four comments received on the IS/ND are discussed below in Section 2 of this document. As a part of the Final ND, the following appendices are included to complete the environmental compliance documentation:

- Appendix A: Comments on the Initial Study/Proposed Negative Declaration
- Appendix B: Initial Study/Proposed Negative Declaration
- Appendix C: Initial Study/Proposed Negative Declaration Mailing List
- Appendix D: Initial Study/Proposed Negative Declaration Newspaper Notice

## 2. COMMENTS RECEIVED ON THE DRAFT INITIAL STUDY/NEGATIVE DECLARATION

The Draft IS/ND was circulated for public review from October 24, 2019 to November 13, 2019 and then again from December 11, 2019 to December 30, 2019. LAWA received four comment letters during the review periods. The comments received included: California Department of Transportation (Caltrans), the Federal Emergency Management Agency (FEMA), the Los Angeles County Regional Planning Commission (as the Airport Land Use Commission), and the Los Angeles Department of Sanitation and Environment (LA Sanitation and Environment). Comments received from the LA Department of Sanitation and Environment and the Los Angeles County Regional Planning Commission determined that review by their respective organizations was not necessary; therefore, LAWA did not respond to these comments in this document. The comment from Caltrans verified that the proposed Project is not expected to impact State transportation facilities. The FEMA comment identified the Flood Insurance Rate Maps (FIRMs) applicable to the City of Los Angeles and Los Angeles County and identified the building requirements of the National Flood Insurance Program. LAWA also received a comment after the comment deadline

on November 14, 2019 from a private citizen, Lawrence de Valencia; however, the comment did not address environmental issues, and LAWA, therefore, did not respond to this comment in this document.

While responding to comments on an IS/ND is not specifically required by CEQA, CEQA Guidelines Section 15074(b) requires that the lead agency consider any comments received on the IS/ND prior to approving the project. Table RTC-1, below, lists comments by a letter identifier, submittal date, and party. Verbatim reproduction of the comment letters is provided below. Scanned copies of all original comment letters are provided in Appendix A.

TABLE RTC-1 COMMENT LETTERS RECEIVED ON THE DRAFT INITIAL STUDY / NEGATIVE DECLARATION

LETTER IDENTIFIER	DATE	SUBMITTING PARTY
C-1	November 5, 2019	Caltrans, via M. Edmonson
C-2	November 6, 2019	LA Sanitation and Environment, via A. Poosti
C-3	November 14, 2019	Los Angeles County Regional Planning Commission, Airport Land Use Commission, via A.J. Bodek
C-4	November 20, 2019	FEMA, via G. Blackburn

## C-1 Caltrans, , via M. Edmonson

## **COMMENT:**

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced ND. The proposed project includes reconfiguring existing passenger gate positions; upgrading the Terminal 4 (T4) Concourse; interior improvements to the T4 West Ticketing Building; realignment of Taxilane C9; upgrades to T4 utilities and operational systems; and the reconstruction and realignment of the T4 aircraft parking apron. In total, approximately 258,000 square feet of new building space would be added to T4. The proposed project would not increase the Airport's operational capacity as the proposed improvements would replace an existing terminal building with an updated structure of similar scale and the same capacity. Los Angeles World Airports (LAWA) is considered the Lead Agency under the California Environmental Quality Act (CEQA).

The nearest State facilities to the proposed project are State Route 1 (SR-1) and Interstate 105 (1-105). SR-1 is located approximately 3,000 feet away from the project and 1-105 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.

As a reminder, Senate Bill 7 43 (2013) mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: http://opr.ca.gov/docs/20190122-743 Technical Advisory.pdf.

Also, 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 establishing "construction worker commute and shift times that avoid contributing to peak period traffic and moderate haul- and delivery-related traffic", as stated in the ND. We also support encouraging truck deliveries to occur during off-peak commute periods, as stated in the Construction Traffic Analysis. If construction traffic is expected to cause delays on state facilities, please submit the Construction Traffic Management Plan for Caltrans' review. This plan should include strategies to mitigate truck traffic. Finally, storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that the project needs to be designed to discharge clean run-off water.

## C-2 LA Sanitation and Environment, via A. Poosti

COMMENT:

This is in response to your October 24, 2019 Notice of Intent to Adopt a Negative Declaration and Initial Study for the Terminal 4 Modernization Project, located at 1 World Way, Los Angeles, CA 90045. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, it has been determined the project is unrelated to sewers and does not require any hydraulic analysis. Please notify our office in the instance that additional environmental review is necessary for this project.

## C-3 Los Angeles County Regional Planning Commission, via A.J. Bodek

COMMENT:

Thank you for the opportunity to comment on the Notice of Preparation for an Environmental Impact Report on the Terminal 4 modernization project at LAX for the upgrading of facilities in the Terminal 4 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.

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.

## C-4 FEMA, via G. Blackburn

COMMENT:

This is in response to your request for comments regarding Notice of Intent to Adopt a Negative Declaration - Los Angeles International Airport (LAX) Terminal 4 Modernization Project.

Please review the current effective Flood Insurance Rate Maps (FIRMs) for the County of Los Angeles (Community Number 065043) and City of Los Angeles (Community Number 060137), Maps revised December 21. 2018. Please note that the City of Los Angeles, Los Angeles County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

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

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

- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any development must not increase base flood elevation levels. The term development means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage-of equipment or materials. A hydrologic and hydraulic analysis must be performed prior to the start of development and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.
- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest horizontal structural member, (excluding the pilings and columns), is elevated to or above the base flood elevation level. In addition, the posts and pilings foundation and the structure attached thereto, is anchored to resist flotation, collapse and lateral movement due to the effects of wind and water loads acting simultaneously on all building components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at http://www.fema.gov/business/nfip/forms.shtm.

## Please Note:

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements.

## 3. RESPONSES TO COMMENTS

As noted above, response to comments from the County of Los Angeles Regional Planning Commission and LA Sanitation and Environment is not required; LAWA has reviewed and noted their comments. LAWA's responses to comments from Caltrans and FEMA are set forth below.

## Response to Comment C-1 (Caltrans)

LAWA appreciates Caltrans' comment noting vehicle miles traveled (VMT) analysis will become the required analytical methodology for determining traffic impacts in CEQA documents on July 1, 2010. LAWA understands that oversized construction equipment would require a Caltrans Transportation Permit and appreciates Caltrans' support of minimization of construction related traffic for all development projects. LAWA and the construction contractor would obtain Caltrans Transportation Permits as required. LAWA would also construct and operate the proposed

Project in accordance with the LAX Design and Construction Handbook and LAX 2015 Storm Water Pollution Prevention Plan to ensure the Project is designed to discharge clean surface runoff. LAWA would submit a Construction Traffic Management Plan if construction traffic associated with the proposed Project is expected to cause traffic delays; however, no construction impacts are anticipated. Construction would be located on Airport property, within the Air Operations Area (AOA), and operation of the proposed Project would not substantially impact the local surface transportation network, consistent with the Caltrans comment

## Response to Comment C-4 (FEMA)

LAWA appreciates FEMA's suggestion to consult the latest FEMA Flood Insurance Rate Maps for the City of Los Angeles and Los Angeles County to ensure construction meets Volume 44 Code of Federal Regulations, Sections 59 through 65, due to the City of Los Angeles' participation in the National Flood Insurance Program (NFIP). The proposed Project would be constructed on the AOA, which is within Zone X (area of minimal flood risk) per the latest FEMA FIRM.

No changes to the conclusions in the Negative Declaration were made in response to these comments and no new evidence was presented to warrant revisions of the Negative Declaration.

## 4. CLARIFICATIONS AND MODIFICATIONS

Clarifications and modifications in the Final IS/ND are provided in strikethrough [strikethrough] and underline [underline] format to highlight revisions and additions to the Draft IS/ND. Revisions in the Final IS/ND are minor and do not constitute a significant change or significant new information; Therefore, no recirculation is required. Revisions to the IS/ND are shown in Sections 2.2.2.4, 2.2.7, 3.2.3, 4.1.1, 4.3.1, 4.6.1, 4.13.1, 4.15.1, 4.18.1, and 4.21.2 of the IS/ND.

Terminal 4 Modernization Project 5 Final Negative Declaration

## **APPENDIX A**

Comments on the Initial Study/Proposed Negative Declaration

## DEPARTMENT OF TRANSPORTATION

DISTRICT 7 – Office of Regional Planning 100 S. MAIN STREET, MS 16 LOS ANGELES, CA 90012 PHONE (213) 897-0475 FAX (213) 897-1337 TTY 711 www.dot.ca.gov



NOV12 1:54PM

November 5, 2019

Ms. Brenda Martinez-Sidhom Los Angeles World Airports Environmental Planning Division P.O. Box 92216 Los Angeles, CA 90009-2216

RE: Los Angeles International Airport (LAX)
Terminal 4 Modernization Project –
Negative Declaration (ND)
GTS # 07-LA-2019-02901
Vic. LA-1/PM: 26.797
LA-105/PM: R0.0

Dear Ms. Brenda Martinez-Sidhom:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced ND. The proposed project includes reconfiguring existing passenger gate positions; upgrading the Terminal 4 (T4) Concourse; interior improvements to the T4 West Ticketing Building; realignment of Taxilane C9; upgrades to T4 utilities and operational systems; and the reconstruction and realignment of the T4 aircraft parking apron. In total, approximately 258,000 square feet of new building space would be added to T4. The proposed project would not increase the Airport's operational capacity as the proposed improvements would replace an existing terminal building with an updated structure of similar scale and the same capacity. Los Angeles World Airports (LAWA) is considered the Lead Agency under the California Environmental Quality Act (CEQA).

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.

As a reminder, Senate Bill 743 (2013) mandates that VMT be used as the primary metric in identifying transportation impacts of all future development projects under CEQA, starting July 1, 2020. For information on determining transportation impacts in terms of VMT on the State Highway System, see the Technical Advisory on Evaluating Transportation Impacts in CEQA by the California Governor's Office of Planning and Research, dated December 2018: <a href="http://opr.ca.gov/docs/20190122-743">http://opr.ca.gov/docs/20190122-743</a> Technical Advisory.pdf.

Also, 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 establishing "construction worker commute and shift times that avoid contributing to peak period traffic and moderate haul- and delivery-related traffic", as stated in the ND. We also support encouraging truck

Ms. Brenda Martinez-Sidhom November 5, 2019 Page 2 of 2

deliveries to occur during off-peak commute periods, as stated in the Construction Traffic Analysis. If construction traffic is expected to cause delays on state facilities, please submit the Construction Traffic Management Plan for Caltrans' review. This plan should include strategies to mitigate truck traffic.

Finally, storm water run-off is a sensitive issue for Los Angeles County. Please be mindful that the project needs to be designed to discharge clean run-off water.

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-2019-02901.

Sincerely,

MIYA EDMONSON

IGR/CEQA Branch Chief

## CITY OF LOS ANGELES

## INTER-DEPARTMENTAL CORRESPONDENCE

DATE:

November 6, 2019

TO:

Evelyn Quintanilla, Chief of Airport Planning II

Los Angeles World Airports

Attn:

Brenda Martínez-Sidhom, Airport Planner

Environmental Planning Section Los Angeles World Airports

FROM:

Ali Poosti, Division Manager

Wastewater Engineering Services Division

LA Sanitation and Environment

SUBJECT:

LOS ANGELES INTERNATIONAL AIRPORT (LAX) TERMINAL 4

MODERNIZATION PROJECT - NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION AND INITIAL STUDY

This is in response to your October 24, 2019 Notice of Intent to Adopt a Negative Declaration and Initial Study for the Terminal 4 Modernization Project, located at 1 World Way, Los Angeles, CA 90045. LA Sanitation, Wastewater Engineering Services Division has received and logged the notification. Upon review, it has been determined the project is unrelated to sewers and does not require any hydraulic analysis. Please notify our office in the instance that additional environmental review is necessary for this project.

If you have any questions, please call Christopher DeMonbrun at (323) 342-1567 or email at <a href="mailto:chris.demonbrun@lacity.org">chris.demonbrun@lacity.org</a>

CD/AP: ra

c:

Kosta Kaporis, LASAN Cyrous Gilani, LASAN

Christopher DeMonbrun, LASAN



November 14, 2019

Los Angeles World Airports
Environmental Planning Section
Attention: brenda Martinez-Sidhom, Airport Planner
Post Office Box 92216
Los Angeles, CA 90009-2216

SUBJECT:

NOTICE OF PREPARATION FOR AN ENVIRONMENTAL IMPACT REPORT FOR

LAX TERMINAL 4 MODERNIZATION PROJECT

Dear Ms. Espiritu,

Thank you for the opportunity to comment on the Notice of Preparation for an Environmental Impact Report on the Terminal 4 modernization project at LAX for the upgrading of facilities in the Terminal 4 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.

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

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

BD:as

U.S. Department of Homeland Security FEMA Region IX 1111 Broadway, Suite 1200 Oakland, CA. 94607-4052



November 20, 2019

Brenda Martinez-Sidhom, Airport Planner Los Angeles World Airport, Environmental Planning Division P. O. Box 92216 Los Angeles, California 90009-2216

Dear Ms. Martinez-Sidhom:

This is in response to your request for comments regarding Notice of Intent to Adopt a Negative Declaration – Los Angeles International Airport (LAX) Terminal 4 Modernization Project.

Please review the current effective Flood Insurance Rate Maps (FIRMs) for the County of Los Angeles (Community Number 065043) and City of Los Angeles (Community Number 060137), Maps revised December 21. 2018. Please note that the City of Los Angeles, Los Angeles County, California is a participant in the National Flood Insurance Program (NFIP). The minimum, basic NFIP floodplain management building requirements are described in Vol. 44 Code of Federal Regulations (44 CFR), Sections 59 through 65.

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

- All buildings constructed within a riverine floodplain, (i.e., Flood Zones A, AO, AH, AE, and A1 through A30 as delineated on the FIRM), must be elevated so that the lowest floor is at or above the Base Flood Elevation level in accordance with the effective Flood Insurance Rate Map.
- If the area of construction is located within a Regulatory Floodway as delineated on the FIRM, any *development* must not increase base flood elevation levels. The term *development* means any man-made change to improved or unimproved real estate, including but not limited to buildings, other structures, mining, dredging, filling, grading, paving, excavation or drilling operations, and storage of equipment or materials. A hydrologic and hydraulic analysis must be performed *prior* to the start of development, and must demonstrate that the development would not cause any rise in base flood levels. No rise is permitted within regulatory floodways.

Brenda Martinez-Sidhom, Airport Planner Page 2 November 20, 2019

- All buildings constructed within a coastal high hazard area, (any of the "V" Flood Zones
  as delineated on the FIRM), must be elevated on pilings and columns, so that the lowest
  horizontal structural member, (excluding the pilings and columns), is elevated to or above
  the base flood elevation level. In addition, the posts and pilings foundation and the
  structure attached thereto, is anchored to resist flotation, collapse and lateral movement
  due to the effects of wind and water loads acting simultaneously on all building
  components.
- Upon completion of any development that changes existing Special Flood Hazard Areas, the NFIP directs all participating communities to submit the appropriate hydrologic and hydraulic data to FEMA for a FIRM revision. In accordance with 44 CFR, Section 65.3, as soon as practicable, but not later than six months after such data becomes available, a community shall notify FEMA of the changes by submitting technical data for a flood map revision. To obtain copies of FEMA's Flood Map Revision Application Packages, please refer to the FEMA website at <a href="http://www.fema.gov/business/nfip/forms.shtm">http://www.fema.gov/business/nfip/forms.shtm</a>.

## **Please Note:**

Many NFIP participating communities have adopted floodplain management building requirements which are more restrictive than the minimum federal standards described in 44 CFR. Please contact the local community's floodplain manager for more information on local floodplain management building requirements. The Los Angeles floodplain manager can be reached by calling Romano Galassi, Civil Engineer Associate, at (213) 847-0405. The Los Angeles County floodplain manager can be reached by calling Patricia Wood, Senior Civil Engineer, at (626) 458-5100.

If you have any questions or concerns, please do not hesitate to call Brian Trushinski of the Mitigation staff at (510) 627-7183.

Sincerely,

Gregor Blackburn, CFM, Branch Chief Floodplain Management and Insurance Branch Brenda Martinez-Sidhom, Airport Planner Page 3 November 20, 2019

cc:

Romano Galassi, Civil Engineer Associate, City of Los Angeles Patricia Wood, Senior Civil Engineer, Los Angeles County, Stormwater Engineering Division Garret Tam Sing, State of California, Department of Water Resources, Southern Region Office

Brian Trushinski, Floodplain Manager Specialist, DHS/FEMA Region IX Alessandro Amaglio, Environmental Officer, DHS/FEMA Region IX

## **APPENDIX B**

## Initial Study/Proposed Negative Declaration

## 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 on the environment and proposes to adopt a Negative Declaration.

Date:

October 24, 2019

To:

All Interested Parties

**Project Title:** 

Los Angeles International Airport (LAX) Terminal 4 Modernization Project

Project Location: The project site (generally LAX Terminal 4 and associated apron area) is located within the Central Terminal Area (CTA) of LAX, between Terminal 5 (east) and Tom Bradley International Terminal (west). 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, east of the Tom Bradley International Terminal 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 Terminal 4 Modernization Project (proposed project) includes the modernization of the existing Terminal 4 (T4) in order to meet seismic and structural safety standards. The modernization of T4 would improve operational efficiency, passenger level of service, and amenities within the terminal, as well as modernize the interior and exterior of the terminal. The proposed project includes reconfiguring existing passenger gate positions; upgrading the T4 Concourse; interior improvements to the T4 West Ticketing Building; realignment of Taxilane C9; upgrades to T4 utilities and operational systems; and the reconstruction and realignment of the T4 aircraft parking apron. In total, approximately 258,000 square feet of new building space would be added to T4. The proposed improvements would provide appropriately sized holdrooms, expanded concessions areas, updated restrooms, and improved passenger circulation. The proposed project would not increase the number of aircraft contact gates (15) at T4 or change the number or type of aircraft operations at T4.

## **Public Review and Comment:**

The proposed Negative Declaration and Initial Study for the proposed project will be available for a 20-day review period beginning on October 24, 2019, 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 Wednesday, November 13, 2019, on the LAX website (www.lawa.org/en/lawa-our-lax, under "Submit a Comment") or by

mail to:

Los Angeles World Airports

Attention: Brenda Martinez-Sidhom, Airport Planner

P.O. Box 92216

Los Angeles, CA 90009-2216



## 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 on the environment and proposes to adopt a Negative Declaration.

Date:

December 11, 2019

ORIGINAL FILED

To:

**All Interested Parties** 

DEC 1 1 2019

**Project Title:** 

Los Angeles International Airport (LAX) Terminal 4 Modernizations Angeles, COUNTY CLERK

Project Location: The project site (generally LAX Terminal 4 and associated apron area) is located within the Central Terminal Area (CTA) of LAX, between Terminal 5 (east) and Tom Bradley International Terminal (west). 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, east of the Tom Bradley International Terminal 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 Terminal 4 Modernization Project (proposed project) includes the modernization of the existing Terminal 4 (T4) in order to meet seismic and structural safety standards. The modernization of T4 would improve operational efficiency, passenger level of service, and amenities within the terminal, as well as modernize the interior and exterior of the terminal. The proposed project includes reconfiguring existing passenger gate positions; upgrading the T4 Concourse; interior improvements to the T4 West Ticketing Building; realignment of Taxilane C9; upgrades to T4 utilities and operational systems; and the reconstruction and realignment of the T4 aircraft parking apron. In total, approximately 258,000 square feet of new building space would be added to T4. The proposed improvements would provide appropriately sized holdrooms, expanded concessions areas, updated restrooms, and improved passenger circulation. The proposed project would not increase the number of aircraft contact gates (15) at T4 or change the number or type of aircraft operations at T4.

## **Public Review and Comment:**

The proposed Negative Declaration and Initial Study for the proposed project will be available for a 20-day review period beginning on December 11, 2019, 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 Monday, December 31, 2019, on the LAX website (www.lawa.org/en/lawa-our-lax, under "Submit a Comment") or by mail to:

Los Angeles World Airports Environmental Planning Division Attention: Brenda Martinez-Sidhom, Airport Planner P.O. Box 92216 Los Angeles, CA 90009-2216

> 2019319226 FILING#



October 2019 |

Los Angeles International Airport

## Proposed Negative Declaration and Initial Study for the Terminal 4 Modernization Project

Prepared for:

Los Angeles World Airports

Prepared by:

**RICONDO** 

Ricondo & Associates, Inc. (Ricondo) prepared this document for the stated purposes as expressly set forth herein and for the sole use of Los Angeles World Airports and its intended recipients. The techniques and methodologies used in preparing this document are consistent with industry practices at the time of preparation and this Report should be read in its entirety for an understanding of the analysis, assumptions, and opinions presented. Ricondo & Associates, Inc. is not registered as a municipal advisor under Section 15B of the Securities Exchange Act of 1934 and does not provide financial advisory services within the meaning of such act.

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## **INITIAL STUDY CHECKLIST**

LEAD AGENCY	COUNCIL DISTRICT	DATE					
Los Angeles World Airport (LAWA)	Council District 11						
<b>RESPONSIBLE AGENCIES:</b> City of Los A	Angeles						
PROJECT TITLE/NO.		CASE NO.					
Los Angeles International Airport (LAX)	Terminal 4 Modernization Project						
BRIEF PROJECT DESCRIPTION:							
The proposed Terminal 4 (T4) Modern renovate the interior of the West Ticker improve passenger level of service, ac resiliency and structural safety in accord standards. Components of the Propose and 1969 satellite extension), and a pobuilding to the linear Terminal building include seismic upgrades to meet curre Connector buildings by a total of 217,0 of baggage make up areas, new consol and repavement of the existing aircraft hydrants, upgrade to aircraft service utility ENVIRONMENTAL SETTING:  The project site is completely developed terminal buildings, aircraft apron and tate PROJECT LOCATION:  The Proposed Project is located within the service of the project within the project is service within the proposed project is located within the project is located within	ting Building, realign Taxilane C9, and commodate modern aircraft fleets at ance with the California Building Stan ed Project include: 1) demolition of the priction of the Connector Building (the grain along World Way); 2) reinforcement building code requirements; 3) exproved the code of the c	rould partially demolish and renovate the T4 Concourse, of reconstruct the apron surrounding the T4 Concourse to and operational support equipment, and provide seismic dards Code and American Society of Civil Engineers (ASCE) are unsalvageable portions of T4 (the original 1961 satellite narrow building that connects the original 1961 Satellite of the remaining portion of the Connector Building to consist of the former Satellite and Satellite Extension, and Inspection Service corridor, modernization and expansion accement of existing concourse facilities; and 4) demolition raft parking positions including underground aircraft fuel units, preconditioned air units, and potable water cabinets.  Wement and terminal buildings. Surrounding uses includeing garages.  in the Central Terminal Area (CTA) of LAX. Terminal 5 sits to the west, while the site is bordered to the south by the					
airfield and to the north by Parking Gar		•					
PLANNING DISTRICT		STATUS:					
Los Angeles International Airport Specif	ic Plan	PRELIMINARY					
		PROPOSED ADOPTED December 14, 2004, as amended in 2013, 2016, and September 8, 2017					
EXISTING ZONING		DOES CONFORM TO PLAN					
LAX - A Zone: Airport Airside Sub-Area		☐ DOES NOT CONFORM TO PLAN☐ NO DISTRICT PLAN					
PLANNED LAND USE & ZONE							
Airport related airside uses							
SURROUNDING LAND USES							
North – Airport Uses;							
East – Airport Uses;							
South – Airport Uses;	South – Airport Uses;						
West – Airport Uses							
TRIBAL CONSULTATION:							
In accordance with Public Resource Co	de §21080.3.1, LAWA <del>transmitted a le</del>	$\frac{1}{2}$					
to with the San Gabriel Band of Mission Indians in response to a standing request that the tribe be informed of excavation activities at							
the LAX. LAWA would complied comple	ywith Assembly Bill 52 requirements t	for consultation, confidentiality, and mitigation <del>during and</del>					
following in regards to the Proposed Project as necessary.							

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## **SUMMARY AND DETERMINATION**

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

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## **ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:**

Los Angeles International Airport – Terminal 4 Modernization

**PROPOSAL NAME** 

Project

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

	, ,		·	•		3. 3
	Aesthetics		Agriculture and Fore	estry Resources		Air Quality
	Biological Resources		Cultural Resources			Energy
	Geology/Soils		Greenhouse Gas Em	issions		Hazards & Hazardous Materials
	Hydrology/Water Quality		Land Use/Planning			Mineral Resources
	Noise		Population/Housing			Public Services
	Recreation		Transportation			Tribal Cultural Resources
	Utilities/Service Systems		Wildfire	Wildfire		Mandatory Findings of Significance
INITIA	AL STUDY CHECKLIST					
PROP	ONENT NAME			PHONE NUMBER		
Los Angeles World Airports				(855) 463-5252		
PROPONENT ADDRESS – Street Address			Mailing Address			
Los Angeles World Airports			P.O. Box 92216			
6053 W. Century Blvd. Suite 1050				Los Angeles California, 90009-2216		
Los Ar	ngeles, California 90045					

**DATE SUBMITTED** 

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## 1. INTRODUCTION

This Initial Study has been prepared by Los Angeles World Airports (LAWA), acting in its capacity as the lead agency under the California Environmental Quality Act (CEQA), to determine whether the construction and implementation of the Terminal 4 (T4) Modernization Project (the Proposed Project) at Los Angeles International Airport (LAX or the Airport) may result in a significant effect on the environment, pursuant to the CEQA Statute and Guidelines.<sup>1,2</sup> LAWA intends for this Initial Study to satisfy the content requirements of CEQA Guidelines Section 15063, subdivision (d)(1)-(6). Based on the analysis contained in this Initial Study, LAWA has determined that construction and operation of the Proposed Project would not result in any significant impacts.

<sup>&</sup>lt;sup>1</sup> California Public Resources Code §21000 et seq.

<sup>&</sup>lt;sup>2</sup> California Code of Regulations, Title 14, §15000 et seq.

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## **Project Title**

Los Angeles International Airport – Terminal 4 Modernization Project

## **Lead Agency Name and Address**

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

## **Contact Person and Phone Number**

Brenda Martinez-Sidhom Airport Planner Los Angeles World Airports P.O. Box 92216 Los Angeles, CA 90009-2216 (855) 463-5252

## **Project Location**

LAX and the surrounding area, Los Angeles County, California

## **Project Sponsor Name and Address**

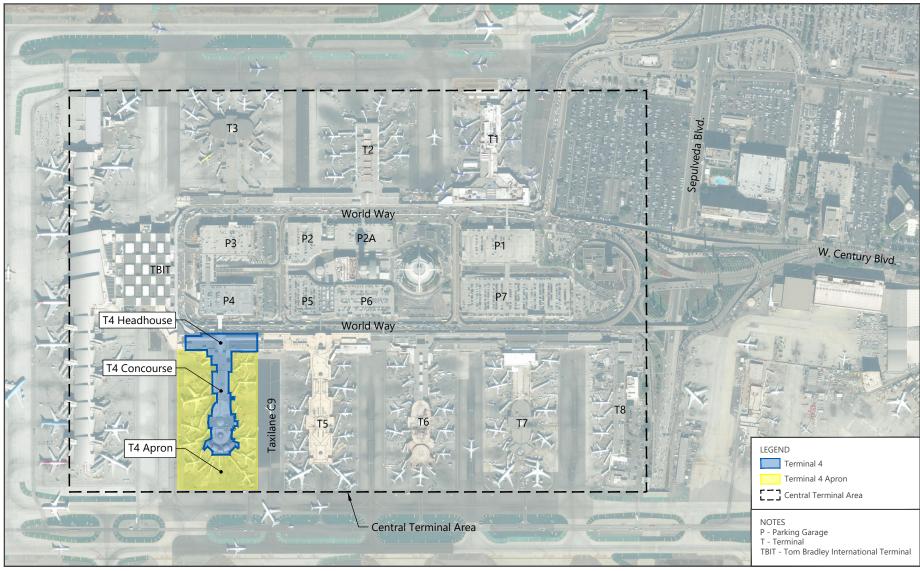
Los Angeles World Airports P.O. Box 92216 Los Angeles, CA 90009-2216

## **Project Area**

The Project area is within the LAX property boundary, at the T4 Concourse building, the West Ticketing portion of the T4 Headhouse, and the T4 airfield apron between the Tom Bradley International Terminal (TBIT), to the west, and Terminal 5 to the east, as depicted on **Exhibit 1-1**.

The state, regional, and local land use plans, policies, and regulations relevant to the project site and surrounding area are listed and discussed in Section 3.2.

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SOURCE: ESRI Basemap, Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community, November, 2016 (aerial image); Ricondo, July 2019 (project location).

**EXHIBIT 1-1** 





PROJECT LOCATION

Drawing: P:\Project-Chicago\LAWA\LAX T4 Improvements\6. AutoCAD\Project Description Exhibits\_20191014.dwgLayout: 01-Proposed Project Location Plotted: Oct 14, 2019, 10:14AM

Terminal 4 Modernization Project Initial Study

## 2. PROJECT DESCRIPTION

## 2.1 INTRODUCTION

The City of Los Angeles, through LAWA in its capacity as owner and operator of Los Angeles International Airport (LAX or the Airport), proposes the modernization of T4 at LAX. The proposed T4 Modernization Project (Proposed Project) entails interior and exterior enhancements to the existing T4 Concourse; improvements to the T4 apron; realignment of Taxilane C9; interior enhancements to the West Ticketing Building within the T4 Headhouse (West Ticketing Building); and improvements to the T4 utilities and operational support systems (i.e., baggage handling system, aircraft resupply systems, etc.). The Proposed Project would demolish, replace, and/or renovate portions of the T4 Concourse building; renovate the interior of the West Ticketing Building; realign Taxilane C9; and reconstruct the aircraft parking apron surrounding the T4 Concourse (see **Exhibit 2-1**) to improve passenger level of service, accommodate modern aircraft fleets and operational support equipment, and provide seismic resiliency and structural safety in accordance with the California Building Standards Code and American Society of Civil Engineers (ASCE) standards. The Proposed Project would not increase the existing number of aircraft contact gates (15) at T4 or otherwise result in a change in aircraft operations. The aircraft parking positions would be realigned to provide greater operational flexibility.

T4 was originally opened in 1961 as a Satellite terminal building and a separate Headhouse; however, the terminal has undergone several alterations and additions. The T4 Concourse now comprises the T4 Headhouse, which is organized into Central, East, and West Ticketing Buildings; the Connector building; the Satellite; and the Satellite Extension (see **Exhibit 2-2**). The Connector building, which connects the Headhouse to the Satellite, opened in 1983 and was renovated in 2001. The T4 Satellite includes the Satellite Extension, which opened in 1969 and was subsequently renovated in 1999. The substructures within the Connector building, the Satellite, and the Satellite Extension are all seismically deficient and require replacement or renovation to comply with ASCE and California Building Standards Code.

The Proposed Project would include demolition of the Satellite and Satellite Extension portions of the T4 Concourse and reinforcement of the Connector, via building expansion and structural upgrade. The proposed new construction and structural supporting elements would increase the square footage of the T4 Concourse. The existing T4 Concourse building envelope would be expanded to accommodate enhancements to the building (see Exhibit 2-2). The Connector would be partially demolished and seismically upgraded to meet modern building code requirements. The realigned Concourse would accommodate improved internal and apron-area operations and support an improved passenger experience by providing appropriately sized holdrooms (i.e., passenger waiting areas), increased concessions offerings, and public restrooms sized and allocated throughout the building in a manner consistent with Airport Cooperative Research Program (ACRP) and International Air Transport Association (IATA) guidelines.

In total, the T4 Concourse would increase by approximately 258,000 square feet, resulting in a total area of approximately 723,735 square feet. A description of the existing and proposed floor areas of each level of the T4 Concourse are provided below and summarized in **Table 2-1**.

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TABLE 2-1: TERMINAL 4 MODERNIZATION PROJECT, EXISTING AND PROPOSED FLOOR AREAS (SQUARE FEET)

TERMINAL 4	EXISTING AREA	EXISTING AREA NO CHANGE	EXISTING AREA RENOVATION	EXISTING AREA REBUILD	PROPOSED NEW AREA	TOTAL AREA
Arrivals Level	90,130	81,030	9,100	-	20,000	110,130
Ramp/Apron Level	140,220	-	74,860	65,360	51,000	191,220
Concourse Level	134,775	-	67,355	67,420	56,000	190,775
Club Level	98,230	-	62,055	36,175	90,000	188,230
Roof Level	2,830	2,830	-	-	41,000	43,380
Total	466,185	83,410	213,370	168,955	258,000	723,735

SOURCE: PGAL, 2019.

## 2.2 PROJECT CHARACTERISTICS

The following subsections provide details of the Proposed Project by building level.

## 2.2.1 ARRIVALS LEVEL

## **Existing Conditions**

The T4 Arrivals level is the lowest level of the T4 Concourse (see **Exhibit 2-3**). The primary purpose of the Arrivals level is to provide subterranean tunnel access for airside passenger and employee circulation between:

- T4 and T5 Concourses for connecting and transfer passengers
- T4 Concourse and Baggage Claim
- T4 International Arrivals and T4 Federal Inspection Services (FIS)

In addition to subterranean tunnels, the Arrivals level contains small operational support spaces. The two northernmost gates on the west side of the T4 Concourse are connected, via a sterile corridor, to the FIS within the T4 Headhouse, through which all arriving international passengers are processed.

## **Proposed Improvements**

The Proposed Project would replace the existing secure vertical circulation, extend the existing FIS corridor southward to increase operational flexibility by allowing all west side gates (6 of the 15 total T4 gates) to accommodate international arrivals, and construct additional Arrivals level support space to accommodate upgraded building systems and operational support functions. Existing building utilities would also be updated.

## 2.2.2 RAMP/APRON LEVEL

The T4 Ramp and Apron Level (Ramp level) comprises an interior and exterior component. The aircraft parking apron, the pavement external to the T4 Concourse building envelope, provides an area for aircraft refueling, resupply, and light maintenance activities. The area internal to the T4 Concourse building

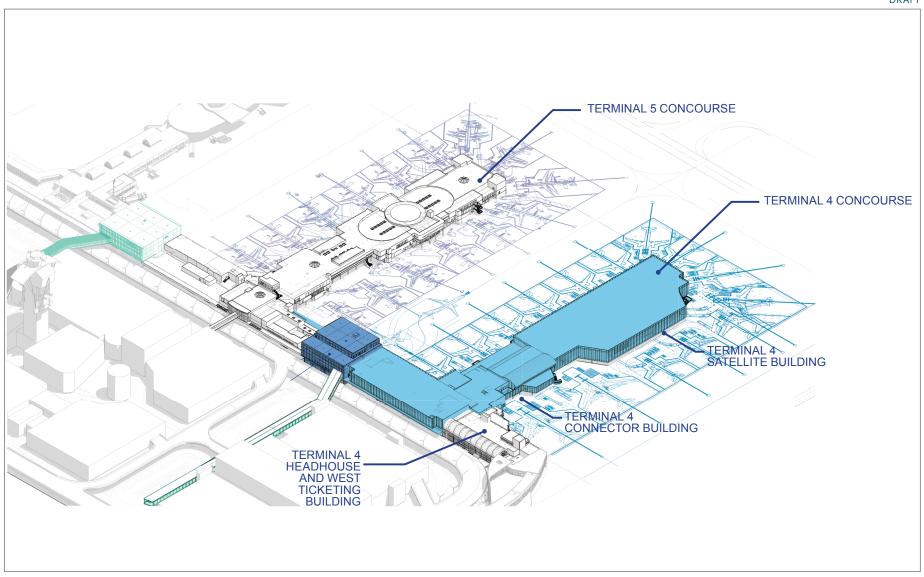


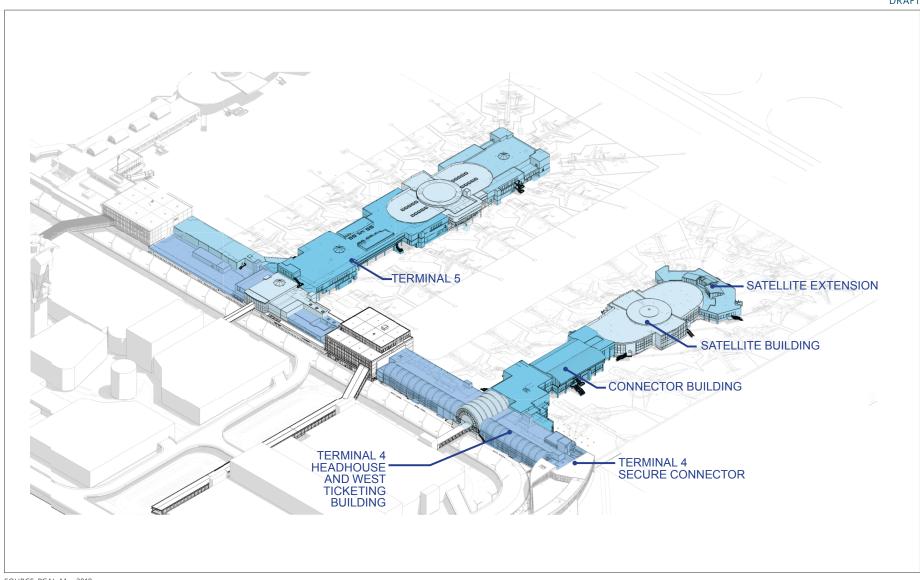
EXHIBIT 2-1

PROPOSED PROJECT

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Terminal 4 Modernization Project Initial Study

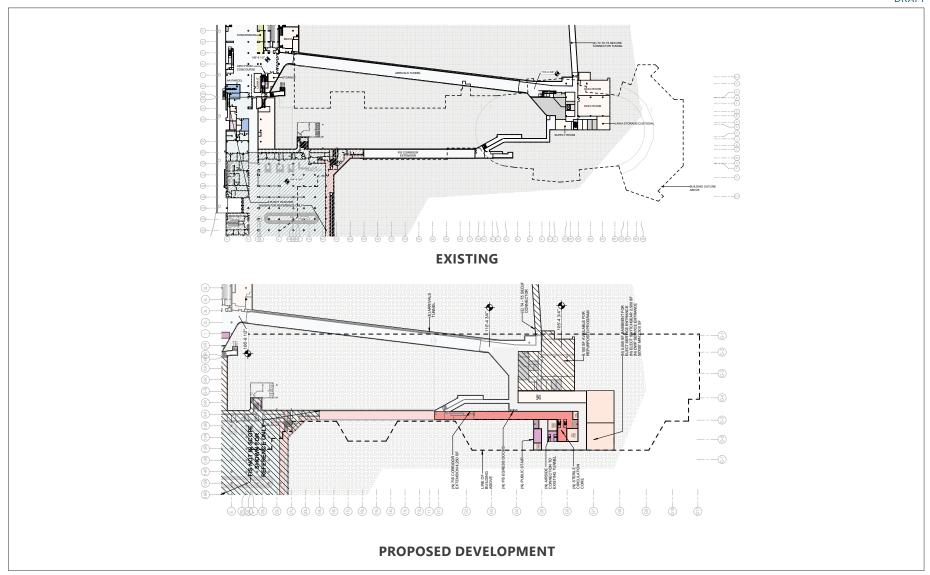


SOURCE: PGAL, May 2019. **EXHIBIT 2-2 EXISTING PROJECT AREA** 

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Terminal 4 Modernization Project Initial Study



SOURCE: PGAL, May 2019.

EXHIBIT 2-3

ARRIVALS LEVEL

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Terminal 4 Modernization Project Initial Study

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envelope, the Ramp area, is comprised of the T4 baggage handling system (BHS) and office and support space for vendor, air carrier, and LAWA operations (see **Exhibit 2-4A**). Beyond the aircraft parking apron are taxilanes for aircraft to taxi between the apron and the active taxiways and runways. The T4 Ramp level also includes a bus gate to shuttle passengers between the T4 Concourse and the American Eagle Commuter Terminal and remote aircraft parking positions. The following provides a description of the existing conditions and proposed improvements at the Ramp level by sub-area.

## 2.2.2.1 AIRPORT APRON

## **Existing Conditions**

The apron extends from the T4 Concourse building envelope to the aircraft parking limit line (see **Exhibit 2-4B**). The apron provides aircraft parking positions for passenger, baggage, and cargo loading and unloading to and from stationary aircraft. Aircraft resupply and minor aircraft maintenance are also completed on the apron. The aircraft parking apron also accommodates storage and movement of ground support equipment (GSE) that serve gated aircraft including baggage tractors, belt loaders, and aircraft tugs. There are currently 15 aircraft parking positions within the T4 apron; however, the arrangement of the aircraft parking, and the associated passenger boarding bridges (PBB), does not efficiently accommodate the current aircraft fleet mix utilized at the terminal. The space allocated to air carrier, tenant, and LAWA airfield support functions on the Ramp level needs to be upgraded.

Beyond the aircraft parking limit line are a series of taxilanes that accommodate aircraft movement between parking positions and the Airport's taxiways and runways, including Taxilane C9, to the east of T4, and Taxilane C10 to the west. Use of Taxilane C9 is currently restricted to airplane design group (ADG) III or smaller aircraft. Per FAA Advisory Circular 150/5300-13A, Taxilane C9 is currently too narrow to permit use by ADG-IV aircraft but is wider than necessary to accommodate the ADG-III aircraft that currently use it. The aircraft parking limit line on the west side of T4, which lies adjacent to Taxilane C10, includes a deviation, or cut-in, at the southern terminus that allows ADG VI aircraft to access Gate 159 at TBIT, on the opposite side of Taxilane C10. The apron cut-in consequently reduces the space available for T4 apron activities, including aircraft parking, at the southwest corner of the T4 apron. Additionally, due to years of continual and intense use, the T4 apron pavement has reached the end of its serviceable life and requires replacement.

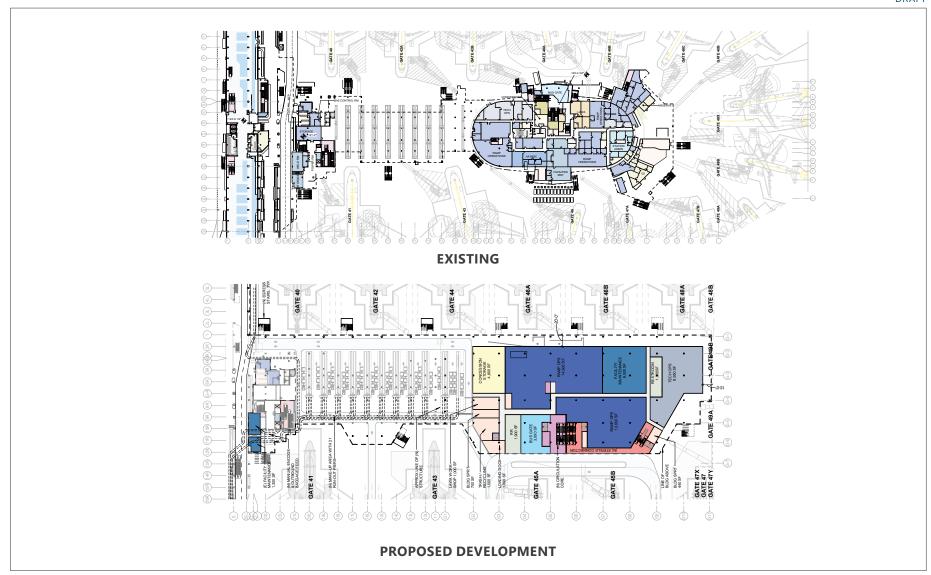
## **Proposed Improvements**

The existing aircraft apron, comprised of 15 aircraft parking positions and associated PBB, would be demolished and repaved in phases; the aircraft parking positions would be realigned to provide operational efficiency and flexibility to accommodate American Airlines existing LAX aircraft fleet. During replacement of the apron pavement, the aircraft fuel hydrants, the fuel pipeline outlets embedded into the apron pavement at each parking position, would be relocated to accommodate the new aircraft parking alignment.

Seven of the existing PBBs would be realigned and the remaining eight PBBs would be replaced with modern equivalents. Upgrades to individual aircraft service utilities would be provided at each PBB, to accommodate parked aircraft, including 400 Hz ground power units, preconditioned air units, and potable water cabinets to supply power, air, and potable water, respectively, to stationary aircraft. Electrical chargers would be installed on the Ramp level to support electric GSE.

The demolition and reconstruction of the Satellite building and Satellite Extension would include the development of additional Ramp level offices, support space, and restrooms for air carrier, vendor, and LAWA staff. The existing width of Taxilane C9 would be reduced and the excess area captured for apron

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SOURCE: PGAL, May 2019.

EXHIBIT 2-4A

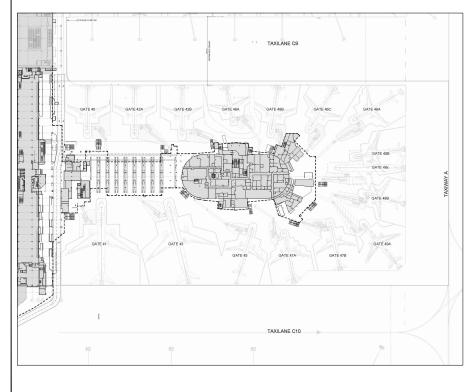
RAMP/APRON LEVEL

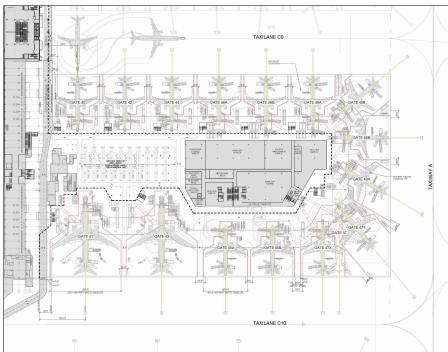
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Terminal 4 Modernization Project Initial Study

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**EXISTING** 

PROPOSED DEVELOPMENT

SOURCE: Los Angeles World Airports, Terminal 4/5 Project Definition Booklet, June 2019.

**EXHIBIT 2-4B** 

Initial Study

NORTH

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TERMINAL 4 APRON LEVEL

Drawing: P:\Project-Chicago\LAWA\LAX T4 Improvements\6. AutoCAD\Project Description Exhibits\_20191014.dwgLayout: 4B Apron Level Plotted: Oct 14, 2019, 10:01AM

Terminal 4 Modernization Project

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operational purposes and to enable expansion of the T4 Concourse building envelope eastward. The additional apron area would also accommodate a two-lane vehicle service road for use by GSE and other airport support equipment on the apron. Similarly, Taxilane C10 would be realigned to remove a cut-in in the aircraft parking limit line at the southwest corner of the apron, allowing for improved apron operations at T4. No demolition of the existing airfield pavement beyond the T4 Concourse apron would be included as part of the Proposed Project.

#### 2.2.2.2 UTILITIES

#### **Existing Conditions**

Many of the existing underground utilities that feed the T4 Concourse are beyond their serviceable lifespan and require replacement in conjunction with the terminal modernization. Existing utilities that require improvements include electrical power, fire and domestic-use water; storm drainage; sanitary sewer; and natural gas.

# **Proposed Improvements**

The Proposed Project would relocate and replace utilities to serve the proposed development. Additions to and enhancements of the T4 utility systems would be required for the new portions of T4, the existing building renovations, and the reconstructed apron area. Standby power utility infrastructure would be installed to support air carrier emergency operations, meet LAWA Design and Construction Handbook requirements, and support life safety systems.

Upgrades to the fire and domestic water system will increase capacity and flow rates to ensure the system is adequate to serve the facility. Improvements will include connecting the fire water loop at T4 to upgraded fire water loops in the Central Terminal Area (CTA). Upgrades to the storm drain system will include modifications to the slopes surrounding the T4 Concourse and relocation and replacement of inlets to meet current National Fire Protection Association 415³ requirements. New service connections from T4 will be constructed to connect to the existing sanitary sewer system and oil/water separators will be installed. Modifications to the natural gas system will be made to correspond to the new configuration and size of building components.

# 2.2.2.3 OUTBOUND BAGGAGE SYSTEMS

#### **Existing Conditions**

The existing T4 Concourse's outbound BHS transports baggage via two mainline conveyors from the West Ticketing Building, within the T4 Headhouse, to the Baggage Make-Up Area, located at the T4 Concourse Ramp level, before the bags are consolidated and hauled to aircraft at the T4 parking positions. The BHS is reaching the end of its serviceable life and does not efficiently meet Airport or air carrier needs.

# **Proposed Improvements**

The existing Ramp level BHS components, under the Connector building, would be modernized with new baggage handling equipment in order to improve operational efficiency to support passenger activity levels including flights at TBIT and at the American Eagle gates. Baggage conveyors, outbound baggage piers, and the manual encoding station will be replaced. In order to accommodate additional outbound baggage piers under the Concourse level, excavation at the apron will be required.

<sup>&</sup>lt;sup>3</sup> National Fire Protection Association, NFPA 415 Standard on Airport Terminal Buildings, Fueling Ramp Drainage, and Loading Walkways, 2016.

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#### 2.2.2.4 BUS GATE

#### **Existing Conditions**

The T4 Ramp level includes a bus gate, and an associated holdroom and shared vertical circulation, through which passengers access shuttle buses operated between the T4 Concourse, the American Eagle Commuter Terminal, and remote gates. The shared vertical circulation is also used by arriving and connecting passengers to access the Arrivals level tunnels. The bus gate (Gate 44) is accessible from the T4 Concourse level via vertical circulation. The existing bus gate does not provide sterile access to the T4 FIS, and is, therefore, only used for domestic operations and international departures. The existing bus gate also serves as a loading dock for materials being delivered to or from T4.

# **Proposed Improvements**

Modifications to the existing T4 Concourse would include a new, consolidated bus gate that would support both international and domestic arrivals and departures. The proposed bus gate would accommodate LAWA and air carrier buses to provide connection from the T4 Concourse to the American Eagle Commuter Terminal and remote gates. A new bus holdroom would be constructed to provide a higher level of service and passenger amenities consistent with the rest of the T4 Concourse. The bus gate would be constructed to include sterile vertical connectivity to the T4 FIS corridor, on the Arrivals level, for international arrivals and vertical circulation to the T4 Concourse level above. A new loading dock on the west side would provide access for deliveries to the building.

The Airport currently operates shuttle buses from the existing T4 bus gate, to transfer passengers between T4 and the remote American Eagle Commuter Terminal east of the Central Terminal Area. The existing shuttle service would continue during construction of the proposed improvements until early 2023, when Phase 2 of the Midfield Satellite Concourse (MSC) Program is scheduled to open. Thereafter, the shuttle service would operate between T4 and the southern extension of MSC, which is approximately 3,600 feet closer to T4 than the remote American Eagle Commuter Terminal.

#### 2.2.3 CONCOURSE LEVEL

#### **Existing Conditions**

The Concourse level is the area of the terminal at which passengers on- and off-board aircraft, wait prior to boarding, and access post-security concessions and other Airport and air carrier services. Specifically, the Concourse level comprises holdrooms; concessions and vendor areas; air carrier and Airport office and support space; storage; and restrooms (see **Exhibit 2-5**). The existing Concourse level of the T4 Connector and Satellite has low ceilings above the holdrooms and concessions areas; a relatively small floor plate; limited natural light; and outdated fixtures and finishes throughout the interior. The holdrooms are undersized for modern fleets and current passenger volumes and the under-sized concessions, vendor, and office space lack many modern amenities. All existing T4 gates currently accommodate domestic flights and international departures. Additionally, Gates 41 and 43 operate as swing gates, via connection to the sterile FIS corridor, thereby accommodating domestic and international arrivals and departures.

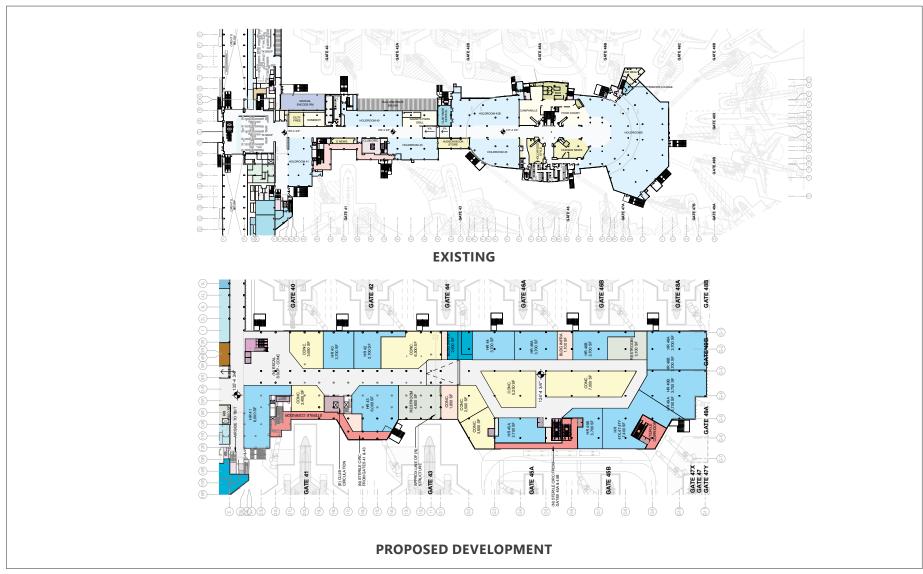
Vertical circulation within the Central Section of the T4 Headhouse provides access to levels below the Concourse level within the T4 Headhouse. Vertical circulation in the West Ticketing Building within the T4 Headhouse provides secure access to the TBIT concourse via the T4/TBIT Secure Connector. Within the T4 Connector building, vertical circulation on the Concourse level provides access to the Club level (above). Vertical circulation within the Satellite provides access from the Concourse level to the bus gate as well as the Arrivals level and the associated tunnels.

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# **Proposed Improvements**

The Proposed Project would result in upgrades to the Connector building and the replacement of the existing Satellite and Satellite Extension structures to enhance passenger experience. The Proposed Project would increase the ceiling height of the Concourse south of the existing Connector, widen holdrooms to provide views of the airfield and surrounding landscape, and provide a facade and interior finish consistent with LAWA design standards.

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SOURCE: PGAL, May 2019.

EXHIBIT 2-5

CONCOURSE LEVEL

0 Not to Scale

corporate: Creative Services:01 Projects:01 Client Projects:2019:LAWA:18011073.11\_LAX Terminal 4 Modernization Project Description Exhibit:LAX Terminal 4 Modernization Exhibits\_October 2019\_v2.indd

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The Proposed Project would also widen the Concourse's circulation corridor, improving passenger movement during peak passenger periods and enhancing passenger experience. The holdrooms and concessions seating areas would be sized to provide the industry standard for seating areas and queuing space per IATA Optimal Level of Service criteria. Concession space would be increased and finished to modern standards to enhance the passenger experience in the terminal.

The Proposed Project would expand the Concourse level to improve passenger amenities, which would include updated restrooms sized to meet existing and future passenger demand, a nursing room, a pet relief station, and an all-gender restroom. The Proposed Project would also provide sterile corridor access and associated vertical circulation to the Arrivals level from all proposed T4 swing gates. The swing gates would maintain an adaptable T4 FIS connection for international arrivals at up to six (6) of the 15 T4 aircraft parking positions. A new connection to the tunnel to T4 FIS, on the Arrivals level, would connect to new sterile vertical circulation.

#### 2.2.4 CLUB LEVEL

# **Existing Conditions**

The Club level currently contains the American Airlines crew lounge, Admirals Club, and the associated vertical circulation and mechanical space (see **Exhibit 2-6**). The Club level is accessible via vertical circulation on the Concourse level.

# **Proposed Improvements**

The Proposed Project would construct an expansion of the building shell southward to provide additional air carrier and Airport office space and enlarge the existing Admirals Club. The replacement Satellite structure would also provide associated building system upgrades. To maintain airfield visibility from the airport traffic control tower, the height of the proposed Club level improvements would not extend above the existing roof line.

#### 2.2.5 ROOF LEVEL

#### **Existing Conditions**

Building system equipment, primarily mechanical air handling units, are located at the roof level. In some cases, the existing equipment is partially enclosed or screened. In many cases the existing equipment is exposed.

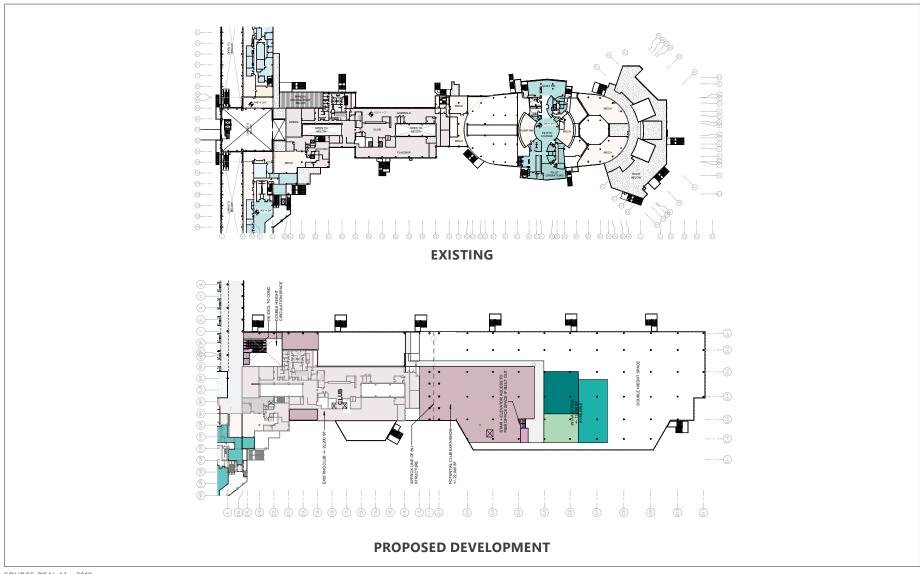
#### **Proposed Improvements**

The Proposed Project would replace equipment located on the roof. Enclosures would be constructed on the roof to accommodate the T4 building control systems, utility and telecommunications components, and new equipment, such as mechanical air handling units.

#### 2.2.6 T4 WEST TICKETING BUILDING

The West Ticketing Building within the T4 Headhouse would be renovated to provide passengers with a higher level of service. Interior reconfigurations at each level would correlate to upgraded conditions in adjacent areas, including reconfigured vertical circulation. Work proposed for the T4 West Ticketing Building would not result in an expansion of the existing building.

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SOURCE: PGAL, May 2019.

EXHIBIT 2-6

CLUB LEVEL

0 Not to Scale

corporate: Creative Services:01 Projects:01 Client Projects:2019:LAWA:18011073.11\_LAX Terminal 4 Modernization Project Description Exhibit:LAX Terminal 4 Modernization Exhibits\_October 2019\_v2.indd

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#### 2.2.7 CONSTRUCTION PHASING

Construction and demolition associated with the Proposed Project would be separated into three phases to allow efficient construction while reducing operational interference. A minimum of eight T4 gates would remain open throughout implementation of the Proposed Project. American Airlines would conduct operations at T5, TBIT, and/or the Midfield Satellite Concourse (MSC), scheduled to open in 2020, to offset the operations affected by the temporary gate closures at T4.

The proposed construction would begin in the third Quarter (Q3) of calendar year 2021 and be completed by Q4 2026. Phase 1, which would begin in Q3 2021, would require closure of the Satellite Extension and 7 aircraft parking positions at the southern terminus of the T4: positions 46B, 46C, 47B, 48A, 48B, 49A, and 49D. During Phase 1, the Satellite Extension would be demolished and replaced with the southernmost portion of the proposed T4 Concourse replacement structure. The portion of the T4 apron which includes the 7 closed aircraft parking positions would be repaved and the aircraft parking positions realigned. Construction employee parking and the majority of the required materials staging areas for the Proposed Project would be located at an off-site location on Airport property between Westchester Parkway and Lincoln Boulevard, approximately 0.8 miles northeast of the Proposed Project site, and at the intersection of South La Tijera Boulevard and Westchester Parkway, approximately 1 mile northeast of the Proposed Project site.

Following the completion of Phase 1 in Q1 2023, the 7 gates and aircraft parking positions closed and realigned as a part of Phase 1 would be reopened. Phase 2, beginning in Q3 2023, would involve closure of 5 aircraft parking positions (40,41, 43, 45, and 47A) to accommodate improvements to the west side of the T4 apron, renovation and expansion of the west side of the existing Satellite and T4 Connector building, and interior renovations to the West Ticketing Building portion of the T4 Headhouse. The Phase 2 renovation, expansion, and apron work would be completed in Q2 2025. Following the completion of Phase 2, 4 of the 5 aircraft parking positions closed for Phase 2 construction would be reopened as well as the west side of the expanded Connector (see **Exhibit 2-7**). Gate 40 may remain closed for use as a construction staging area. Phase 3 would begin in Q3 of 2025 and would include renovation of the east sides of the existing Satellite and T4 Connector buildings; continued interior renovation of the West Ticketing Building portion of the T4 Headhouse; temporary closure of 3 aircraft parking positions (42A, 42B, and 46A); and improvements to the east side of the T4 apron. Upon completion of Phase 3, in Q4 2026, the east side of the T4 Concourse would be opened, completing the Concourse, and the three remaining aircraft parking positions closed as a part of Phase 3 would be returned to service.

As noted above in Section 2.2.2.4, the Airport currently operates shuttle buses, from the existing T4 bus gate, to transfer passengers between T4 and the remote American Eagle Commuter Terminal east of the Central Terminal Area. This shuttle service would continue during construction of the proposed improvements until early 2023, when Phase 2 of the MSC Program is scheduled to open. Thereafter, the shuttle service would operate between T4 and the southern extension of MSC.

# 2.3 REQUIRED APPROVALS AND CONSULTATIONS

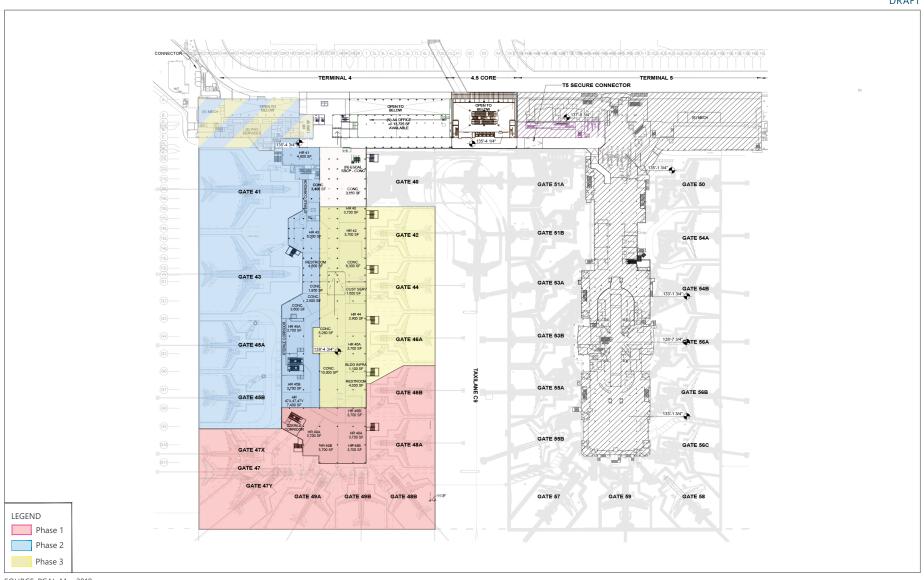
LAWA is the lead agency for the CEQA review of the Proposed Project at LAX and is the "public agency which has the principal responsibility for carrying out or approving [the] project."<sup>4</sup> As the lead agency, LAWA is responsible for conducting environmental review of LAX projects under the CEQA Statute and Guidelines. There are no

<sup>&</sup>lt;sup>4</sup> California Code of Regulations, Title 14, §15367; Public Resources Code, §21067.

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responsible agencies for the project because no other agency has discretionary approval power over the proposed Project or would carry out the project.

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SOURCE: PGAL, May 2019.

0 Not to Scale

CONSTRUCTION PHASING

**EXHIBIT 2-7** 

corporate: Creative Services:01 Projects:01 Client Projects:2019:LAWA:18011073.11\_LAX Terminal 4 Modernization Project Description Exhibit:LAX Terminal 4 Modernization exhibits\_October 2019\_v2.indd

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# 3. ENVIRONMENTAL SETTING

# 3.1 INTRODUCTION

LAX is located in Los Angeles County (LA County), within the City of Los Angeles proper. The Airport is generally bounded by the City of Los Angeles communities of Westchester and Playa del Rey to the north; the City of Inglewood, City of Hawthorne, and Lennox, an unincorporated area of LA County, to the east; the Del Aire area of unincorporated LA County and the City of El Segundo to the south; and the Pacific Ocean to the west (**Exhibit 3-1**). The streets that generally bound the Airport are Vista Del Mar to the west; Imperial Highway to the south; Westchester Parkway to the north; and Sepulveda, Aviation, and La Cienega Boulevards to the east. Existing Airport uses include runways and taxiways; passenger terminals; air cargo and aviation support facilities; parking garages; surface parking lots; airport- and aviation related administrative facilities; utilities; and public and private roadways.

#### 3.2 RELATIONSHIP TO EXISTING PLANS AND DOCUMENTS

The existing plans and documents that are relevant to the Airport and the Project site are described below.

#### 3.2.1 CALIFORNIA COASTAL ACT

The California Coastal Act (CCA) was enacted to establish policies and guidelines that provide direction for the conservation and development of the California coastline and administering the federal Coastal Zone Management Act. The California Coastal Commission (the Coastal Commission), through the CCA, is responsible for the protection of regional, state, and national interests in assuring the maintenance of the long-term productivity and economic vitality of coastal resources necessary for the well-being of the people of the state; avoidance of long-term costs to the public and a diminished quality of life resulting from the misuse of coastal resources; and, continued state coastal planning and management through the state Coastal Commission. Under the provisions of the CCA, development projects located in the coastal zone must receive an additional level of review to assess potential impacts to coastal resources. The western end of LAX is within the coastal zone; however, the coastal zone boundaries lie outside of the Proposed Project site. Developmental regulations of the CCA would not apply to the Proposed Project.

### 3.2.2 CITY OF LOS ANGELES GENERAL PLAN

California State law (Government Code Section 65300) requires that each city prepare and adopt a comprehensive, long-term general plan for its future development. This general plan must address seven elements, including land use, circulation, housing, conservation, open space, noise and safety. In addition, State law (Government Code Section 65302) permits cities to include optional elements in their general plans, thereby providing local governments with the flexibility to address the specific needs and unique character of their jurisdictions. California State law requires that operation of a city be consistent with the general plan. More specifically, Government Code Sections 65860, 66473.5, and 656474 require that zoning ordinances and subdivision and parcel map approvals be consistent with the general plan.

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SOURCE: LAX Design Guidelines, 2017. (Modified).

EXHIBIT 3-1

PROJECT AREA MAP

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corporate: Creative Services:01 Projects:01 Client Projects:2019: LAWA:18011073.11\_LAX Terminal 4 Modernization Project Description Exhibit: LAX Terminal 4 Modernization Exhibit: LAX Terminal 4 Modernization Exhibits.

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The City of Los Angeles General Plan Framework Element establishes the conceptual basis for the City's General Plan. The General Plan Framework sets forth a Citywide, comprehensive, long-range growth strategy and defines Citywide policies through the following chapters: Land Use, Housing, Urban Form and Neighborhood Design, Open Space and Conservation, Economic Development, Transportation, and Infrastructure and Public Services. General Plan land use policies are further guided at the community level through community plans and specific plans. The General Plan policies related to transportation are set forth in the Mobility Plan 2035.

The LAX Plan<sup>5</sup> is the community plan for the LAX area and was adopted concurrently with the LAX Master Plan, approved by the Los Angeles City Council in December 2004 and amended in 2013 and 2017. The LAX Plan is part of the Land Use Element of the City of Los Angeles General Plan. The LAX Plan establishes the land use policy for LAX and is intended to promote an arrangement of airport uses that encourages and contributes to the modernization of the Airport in an orderly and flexible manner within the context of the City and region. It provides goals, objectives, policies, and programs that establish a framework for the development of facilities promoting the movement and processing of passengers and cargo within a safe and secure environment. The LAX Plan is intended to allow the Airport to respond to emerging new technologies, economic trends, and functional needs.

In 2004, in connection with approval of the LAX Master Plan, the City Council approved the LAX Specific Plan.<sup>6</sup> Amended in 2013, 2016, and 2017, the LAX Specific Plan contains land use regulations and procedures for the processing of future individual projects and activities under the LAX Plan. While the LAX Plan identifies goals, objectives, and policies, the LAX Specific Plan details use limitations and design regulations within the plan area.

#### 3.2.3 LAX DESIGN GUIDELINES

The Los Angeles International Airport Design Guidelines (Design Guidelines) establish LAWA's comprehensive aesthetic and architectural vision for to enhance the passenger experience at LAX.7 The Design Guidelines provide a basis for new development to create an improved passenger experience that honors LAX's historic and architectural resources, while providing design guidance for new construction and major renovations consistent with Airport needs and existing conditions. The Design Guidelines apply to specific LAWA development projects, including the Landside Access Modernization Program (LAMP) projects; terminal improvements to the terminal facades in the CTA, and CTA parking structures. The Design Guidelines encourage the development of more sustainable and user-friendly spaces with a focus on unified, high quality architecture and urban design with an emphasis on the passenger experience.

#### 3.2.4 LAX DESIGN AND CONSTRUCTION HANDBOOK

The LAX Design and Construction Handbook® (the Handbook) provides guidance for planning, design, construction, project acceptance, and closeout for development at LAX. The Handbook is intended to help projects meet LAWA's

<sup>&</sup>lt;sup>5</sup> City of Los Angeles, Department of City Planning, *LAX Plan*, adopted December 14, 2004, last amended May 24, 2013, Available: http://planning.lacity.org/complan/specplan/pdf/LAXPLAN\_AMENDED20130524\_FINAL(SECURED).pdf.

<sup>&</sup>lt;sup>6</sup> City of Los Angeles, Department of City Planning, Los Angeles International Airport (LAX) Specific Plan, adopted December 14, 2004, last amended June 14, 2016, Available: http://clkrep.lacity.org/onlinedocs/2013/13-0285-s3\_ORD\_184348\_6-15-16.pdf.

City of Los Angeles, Los Angeles World Airports, LAX Design and Construction Handbook, April 2011. Available: https://www.lawa.org/-/media/lawa-web/tenants411/file/lawa-design-and-construction-handbook-4\_15\_2011.ashx?la=en&hash=DE1C7ACF6AF57AA13DEDE72B94AAB6845151D04D

City of Los Angeles, Los Angeles World Airports, LAX Design and Construction Handbook, April 2011. Available: https://www.lawa.org/-/media/lawa-web/tenants411/file/lawa-design-and-construction-handbook-4\_15\_2011.ashx?la=en&hash=DE1C7ACF6AF57AA13DEDE72B94AAB6845151D04D

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expectations for achieving passenger and employee safety, limiting impacts to Airport operations, and enhancing the overall LAWA service environment. The Handbook would be applicable to the Proposed Project.

# 3.2.5 LAX PRESERVATION PLAN

The LAX Preservation Plan was prepared as part of the Environmental Impact Report for the LAMP. The Preservation Plan provides direction for identification, study, rehabilitation and protection of historic resources located on the LAX property. The Preservation Plan will serve as the framework for the future repair, maintenance, and alteration of historic resources located on the LAX property and guide the manner in which planning of future projects addresses historic resources during and following construction.

# 3.2.6 LOS ANGELES MUNICIPAL CODE

The Municipal Code includes regulatory provisions for development within the City of Los Angeles, including building regulations, noise standards, specific plans, and zoning. Where the LAX Specific Plan provides more restrictive zoning and land use requirements, the Specific Plan supersedes the Municipal Code.

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Historic Resources Group. Los Angeles International Airport Preservation Plan, Available: https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/plan-and-ordiance/2016-preservation-plan.pdf. September 2016.

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# 4. ENVIRONMENTAL IMPACTS

The Environmental Impacts section provides supporting documentation of the environmental impact determinations in the Initial Study Checklist, per Section 15063 of the CEQA Statute and Guidelines. Each response provided below evaluates how the Proposed Project, as defined in the Project Description (Section 2), may affect existing environmental conditions of 20 environmental resource categories at the Proposed Project site and in the surrounding area. The evaluation and discussion are based on the environmental checklist published in the CEQA Guidelines. <sup>10</sup>As identified and discussed below, the Proposed Project would not result in significant environmental impacts.

#### 4.1 **AESTHETICS**

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Have a substantial adverse effect on a scenic vista?			X	
b)	Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?				Х
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?			X	
d)	Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?			Х	

#### 4.1.1 DISCUSSION – (A AND C)

LAX is located in a fully urbanized area that is surrounded by existing commercial, industrial, and residential uses. The Proposed Project site lies within an active airport terminal complex and airfield and the visual environment is consistent with a large-hub international airport. The Proposed Project site is an active terminal with ticketing, passenger processing, baggage processing and claims areas; passenger holdrooms; gates and passenger boarding bridges; and aircraft apron areas.

Scenic vistas in the vicinity of the Proposed Project site include the Pacific Ocean to the west and the Santa Monica Mountains to the north. Views of these vistas are not available from the Proposed Project site as the topography, the distance between the Airport and the vistas, and existing Airport facilities obstruct viewsheds. Views of the Pacific Ocean from residences located to the north and south of Airport would not be obstructed by the Proposed Project based on the distance and topography of the Proposed Project site to both the residences and the Pacific

<sup>&</sup>lt;sup>10</sup> CEQA Guidelines, *Appendix G, Environmental Checklist Form*, as amended December 2018.

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Ocean. Furthermore, the proposed improvements would not add additional facility height and upon completion would be consistent with the existing visual environment.

Views of the Santa Monica Mountains are available from residences in the El Segundo residential neighborhood to the south of the Proposed Project site. El Segundo views to the Santa Monica Mountains are generally restricted to residences at higher elevations due to existing berms on the south side of Imperial Highway blocking views from lower elevations. The Airport, and in particular T4, is not significantly within, and does not contribute to, scenic vistas from north-facing El Segundo residences at higher elevations.

Terminal improvements would not alter existing long-range views of the Santa Monica Mountains due to the distance of the Proposed Project site to residences and the substantially higher vantage points to the south. While construction of the Proposed Project and the presence of associated construction equipment may be visible, it would be consistent with existing visual character and views of the LAX site. Overall, impacts to scenic vistas would be less than significant.

The Proposed Project involves the modernization and redevelopment of a terminal facility. The Proposed Project would be constructed to the LAX Design Guidelines to be consistent with the aesthetic character of the development area and would be completed in accordance with the California Building Standards Code, and the City of Los Angeles Zoning Code, and the LAX Design Guidelines. Thus, the Proposed Project would not conflict with any applicable zoning or other regulations governing scenic quality.

Therefore, the implementation of the Proposed Project would not affect public views or alter the scenic quality of the Proposed Project site or surrounding area and would not conflict with any applicable zoning or other regulations governing scenic quality. The impact of the Proposed Project on aesthetics would be less than significant.

#### 4.1.2 DISCUSSION – (B)

The Proposed Project site is located within an active airfield and is not located adjacent to or within the viewshed of a designated state scenic highway. The nearest designated state scenic highway is approximately 4 miles east of the Proposed Project site (California State Route 1, beginning at Venice Boulevard).<sup>12</sup> The Proposed Project site is not visible from the designated scenic highway portion of California State Route 1. Therefore, the Proposed Project would not impact scenic resources within a state scenic highway. The Proposed Project site also does not contain scenic resources, such as trees or rock outcroppings and Terminal 4 is not within the line of site of or adjacent to the Theme Building or former airport traffic control tower. The Proposed Project would not affect views of these notable structures; therefore, the Proposed Project would have no impact.

#### 4.1.3 DISCUSSION – (D)

Uses within and surrounding LAX generate varying degrees of light emissions. Primary sources of light at LAX include buildings (i.e., terminals, cargo, and maintenance facilities, etc.), safety and operational lighting (airfield lighting, parking, street lighting, wayfinding, etc.), and private vehicles, buses, and shuttles. Existing LAX facilities, including Terminal 4, produce light consistent with highly urbanized areas, which specifically provides for the safety and security of people, property, and aircraft operations at LAX. Certain Airport facilities are visible from the Airport's periphery and emit light at intensities beyond average ambient light conditions; however, existing lighting does not

<sup>&</sup>lt;sup>11</sup> Los Angeles World Airports, LAX Design Guidelines, March 24, 2017

<sup>&</sup>lt;sup>12</sup> California Department of Transportation, *California Scenic Highway Mapping System website*, updated September 7, 2011. Available: http://www.dot.ca.gov/hq/LandArch/16\_livability/scenic\_highways/index.htm.

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interfere with nighttime Airport operations. Existing sources of glare on the Proposed Project site are associated with the reflective glass or finishes of facilities and structures within the Airport. Existing nighttime sources of glare are primarily associated with Airport facilities and headlights of vehicles traveling throughout the Project site.

The Proposed Project would include interior and exterior enhancements to the T4 structure, and improvements to the apron area. Sources of light and glare associated with the Project may change location and minor additional sources of lighting and glare could be added; however, these changes would be consistent with the existing T4 environment and typical of a modern airport airfield area. The Proposed Project would meet FAA Advisory Circular 150/5300-13A requirements to ensure that new facilities would not pose any hazard to aircraft or air traffic controllers. Based on the above, the implementation of the Proposed Project would not alter lighting to create a new source of substantial light or glare that would adversely affect day or nighttime views in the area. Impacts to light and glare would be less than significant.

# 4.2 AGRICULTURE AND FORESTRY RESOURCES

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?				Х
b)	Conflict with existing zoning for agricultural use, or a Williamson Act contract?				Х
c)	Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code Section 12220(g)), timberland (as defined in Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?				Х
d)	Result in the loss of forest land or conversion of forest land to non-forest use?				Х
e)	Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to non-agricultural use or conversion of forest land to nonforest use?				Х

# 4.2.1 DISCUSSION

The Proposed Project site is located within a fully-developed airport, surrounded by airport-related uses and fully developed urbanized areas. There are no farmlands that are considered prime, unique or of statewide or local importance in the vicinity of the Proposed Project site. Furthermore, no agricultural resources or operations currently exist or have existed in the recent past on or in vicinity of the Proposed Project.<sup>13</sup> No agricultural resources, operations, or land under the Williamson Act are on the Proposed Project site or within the surrounding areas. Additionally, no forest or timberland resources exist at or in the vicinity of the Proposed Project site. Consequently,

<sup>&</sup>lt;sup>13</sup> City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report, Los Angeles International Airport (LAX) Proposed Master Plan Improvements, April 2004.

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the Proposed Project would have no impact on agriculture and forestry resources. The Proposed Project would not impact agriculture or forest resources.

# 4.3 AIR QUALITY

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Conflict with or obstruct implementation of the applicable air quality plan?			Х	
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?			Х	
c)	Expose sensitive receptors to substantial pollutant concentrations?			Х	
d)	Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?			Х	

# 4.3.1 DISCUSSION (A, B, AND C)

The South Coast Air Quality Management District (SCAQMD) has adopted a series of Air Quality Management Plans (AQMPs) to meet the CAAQS and NAAQS. SCAQMD and CARB have adopted the 2012 AQMP which incorporates the latest scientific and technological information and planning assumptions, including the 2012-2035 Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS), and updated emission inventory methodologies for various source categories. The Final 2012 AQMP was adopted by the AQMD Governing Board on December 7, 2012. SCAQMD released the Draft 2016 AQMP for public review on June 30, 2016. The Draft 2016 AQMP includes baseline emissions assumptions consistent with the 2016 RTP/SCS, approved by SCAG on April 7, 2016 and approved by EPA on October 1, 2019 but not effective until October 31, 2019. The AQMP builds upon other agencies' plans to achieve federal standards for air quality in the Basin. It incorporates a comprehensive strategy aimed at controlling pollution from all sources, including stationary sources, and on-road and off-road mobile sources. The 2016 AQMP builds upon improvements in previous plans, and includes new and changing federal requirements, implementation of new technology measures, and the continued development of economically sound and flexible compliance approaches. In addition, it highlights the significant amount of emission reductions needed and the urgent need to identify additional strategies, especially in the area of mobile sources, to meet all federal criteria pollutant standards within the timeframes allowed under the federal CAA.

The SCAQMD also adopts rules to implement portions of the AQMP. At least one of these rules is applicable to the construction of the Proposed Project. Rule 403 requires the implementation of best available fugitive dust control measures during active construction activities capable of generating fugitive dust emissions from on-site earthmoving activities, construction/demolition activities, and construction equipment travel on paved and unpaved roads. Also, SCAQMD Rule 113 limits the amount of VOCs from architectural coatings in solvents, which lowers the emissions of odorous compounds.

The Proposed Project would comprise improvements to the T4 Concourse and West Ticketing Building, including renovation and reinforcement of the T4 Connector and reconstruction of the Satellite and Satellite Extension.

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Additionally, the aircraft apron pavement surrounding T4 would be demolished and replaced. The proposed improvements would improve safety and efficiency at T4 while maintaining the existing number of aircraft gates.

Regarding National Ambient Air Quality Standards (NAAQS), established under the Clean Air Act (CAA), the South Coast Air Basin, which includes LAX, is in attainment for nitrogen dioxide (NO<sub>2</sub>), sulfur dioxide (SO<sub>2</sub>), carbon monoxide (CO), and particulate matter less than ten microns in diameter (PM<sub>10</sub>); extreme nonattainment for ozone (O<sub>3</sub>); and serious nonattainment for particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>).<sup>14</sup> For the California Ambient Air Quality Standards (CAAQS), the South Coast Air Basin is designated as a nonattainment area for ozone (O<sub>3</sub>), PM<sub>10</sub>, and PM<sub>2.5</sub>, and attainment for CO, NO<sub>2</sub>, and SO<sub>2</sub>.<sup>15</sup> While portions of the Basin are in nonattainment, cumulative conditions have improved since the inception of air pollutant monitoring in 1976. Despite an approximately 30 percent increase in the state's vehicle population and vehicle miles traveled since 1990, air quality in the state has dramatically improved. In 1990, the entire South Coast region exceeded the 80 parts per billion (ppb) 8-hour ozone standard. Today, California has reduced emissions by over half, ozone concentrations have declined 40 percent, and the number of days when pollution levels exceed the 80 ppb ozone standard has declined by more than 60 percent. As discussed in the 2016:

Since the end of World War II, the Basin has experienced faster population growth than the rest of the nation. The annual average percent growth has slowed but the overall population of the region is expected to continue to increase through 2023 and beyond... Despite this population growth, air quality has improved significantly over the years, primarily due to the impacts of air quality control programs at the local, state and federal levels....PM<sub>2.5</sub> levels in the Basin have improved significantly in recent years. By 2013 and again in 2014 and 2015, there were no stations measuring PM<sub>2.5</sub> in the Basin violating the former 1997 annual PM<sub>2.5</sub> NAAQS (15.0  $\mu$ g/m³) for the 3-year design value period with the filter-based federal reference method (FRM). On July 25, 2016 U.S. EPA finalized a determination that the Basin attained the 1997 annual (15.0  $\mu$ g/m³) and 24-hour PM<sub>2.5</sub> (65  $\mu$ g/m³) NAAQS, effective August 24, 2016.

Following construction, operation of T4 would not result in a significant increase in emissions. The renovated T4 facility would serve in the same capacity as the existing T4 Concourse; facilitating existing and forecast passenger levels at 15 aircraft gates. Improvements to the apron and taxilanes proposed as a part of the T4 Modernization project would be relatively minor and would not induce growth in aircraft operations or result in a change to aircraft procedures. The proposed project may also reduce regional air pollutant emissions. In addition to adherence to the LAX Design Guidelines, the The Proposed Project would incorporate modern building materials and internal systems technology in accordance with the Los Angeles Green Building Code, Los Angeles Green New Deal, and LEED® Silver requirements, resulting in an increase in energy efficiency for T4 operations. Further, the Proposed Project is targeting a 12 to 14 percent increase in energy efficiency over baseline demand. To the extent possible, if approved by FAA, solar photovoltaic panels will be installed on the T4 roof, which would reduce energy demand even further and produce renewable energy credits.

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<sup>&</sup>lt;sup>14</sup> US Environmental Protection Agency, Green Book, California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants, https://www3.epa.gov/airquality/greenbook/anayo\_ca.html (accessed September 12, 2019).

http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf (accessed September 12, 2019).

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A quantitative and qualitative air quality analysis was performed for construction of the Proposed Project (see **Attachment 1**). <sup>16</sup> As shown in **Table 4-1**, emissions associated with construction of the Proposed Project would not exceed the mass daily thresholds of significance for construction defined by SCAQMD and pursuant to the California Clean Air Act. <sup>17</sup>

TABLE 4-1: PROPOSED PROJECT CONSTRUCTION EMISSIONS SUMMARY

	EMISSIONS (POUNDS/DAY)						
YEAR BY PHASE	CO	VOC	NOx	SO <sub>X</sub>	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2E</sub>
Phase 1							
2021	15	2	21	0	3	1	2,976
2022	25	35	43	0	23	5	10,806
2023	23	2	32	0	27	5	10,482
Phase 2							
2023	21	2	22	0	3	1	4,834
2024	29	46	37	0	22	5	11,309
2025	16	1	18	0	26	7	6,953
Phase 3							
2025	20	2	20	0	2	1	4,762
2026	28	46	31	0	11	4	9,053
Maximum Daily Emissions							
2021	15	2	21	0	3	1	2,976
2022	25	35	43	0	23	5	10,806
2023	23	2	32	0	27	5	10,482
2024	29	46	37	0	22	5	11,309
2025	20	2	20	0	26	7	6,953
2026	28	46	31	0	11	4	9,053
Overall Maximum	29	46	43	0	27	7	11,309
Mass Daily Threshold of Significance	550	75	100	150	150	55	
Significant?	No	No	No	No	No	No	

#### NOTES:

CO = carbon monoxide  $SO_X = oxides of sulfur$ 

VOC = volatile organic compound  $PM_{10}$  = particulate matter less than ten microns in diameter  $NO_X$  = oxides of nitrogen  $PM_{25}$  = particulate matter less than 2.5 microns in diameter

CO<sub>2e</sub> = carbon dioxide equivalent (in metric tons per year)

Totals may not sum due to rounding.

SOURCE: Ricondo & Associates, Inc., October 2019, based on information provided by Pierce Goodwin Alexander & Linville, Inc. and default calculations performed within the California Emissions Estimator Model version 2016.3.2.

The Proposed Project would not result in an increase in number of passengers or aircraft operations at LAX and the improved T4 Concourse would operate in the same location, and in the same manner, as the existing T4 Concourse. Neither construction nor operation of the Proposed Project would conflict with the SCAQMD Air Quality Management Plan, the California State Implementation Plan (SIP), or inhibit the reduction of criteria pollutants, or increase toxic risk.

Minimum passenger level of service requirements for LAX require that a minimum of eight aircraft gates remain open at T4 during construction of the Proposed Project, which would require the construction to be extended over

<sup>&</sup>lt;sup>16</sup> Air quality analysis assumptions were based on schedule and equipment data provided by LAWA. It was assumed that diesel construction equipment over 50 horsepower would perform to Tier 4 emission standards. Further detail is provided in Attachment 1.

<sup>&</sup>lt;sup>17</sup> South Coast Air Quality Management District. South Coast AQMD Air Quality Significance Thresholds. April 2019.

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a period of approximately 5.5 years. Air quality analysis for the Proposed Project determined the proposed construction would not exceed CAAQS mass daily thresholds of significance, in compliance with the SIP and the SCAQMD Air Quality Management Plan. Based on SCAQMD's cumulative air quality impact methodology, SCAQMD recommends that if an individual project results in air emissions of criteria pollutants (ROG, CO, NOx, SOX, PM<sub>10</sub>, and PM<sub>2.5</sub>) that exceed the SCAQMD's recommended daily thresholds for project-specific impacts, then it would also result in a cumulatively considerable net increase of these criteria pollutants for which the project region is in nonattainment under an applicable federal or state ambient air quality standard. As outlined in Table 4-1 below, the Proposed Project would not result in a cumulatively considerable net daily or annual increase in criteria pollutants for which the region is in non-attainment per state or federal standards respectively.

The Proposed Project would partially demolish, renovate, and reconstruct the T4 Concourse at LAX. The Proposed Project would be consistent with existing Airport uses and would not result in an increase in the number of passengers or aircraft operations at the Airport. Adjacent land uses within the CTA are consistent with airport terminal and airfield activities and are compatible with the Proposed Project. The temporary closure of aircraft gates and displacement of operations at those gates to MSC, TBIT, or T5 would not substantially change aircraft taxi patterns or result in a significant change in jet fuel usage. As demonstrated in analyses conducted analyzing aircraft taxiing shifts to the MSC from other CTA terminals, the central location of MSC (and by extension TBIT) on the LAX airfield means that on average, aircraft taxi distance does not significantly change. Additionally, the existing shuttle bus gate operations serving the American Eagle commuter terminal are expected to cease in early 2023 with the opening of MSC South Phase 2. Bus operations from T4 would then serve MSC South, which is approximately 3,600 feet closer to T4 than the American Eagle terminal and would, therefore, reduce emissions associated with the T4 bus gate operations. LAWA is currently transitioning the airfield buses to a 100 percent electric fleet, which would eliminate emissions directly associated with airfield bussing operations. The Proposed Project would neither expose sensitive receptors to substantial pollutant concentrations or result in other emissions that adversely affect a substantial number of people on- or off-Airport.

# 4.3.2 DISCUSSION (D)

The use of diesel equipment during construction would generate odors. Diesel equipment emits a distinctive odor that may be considered offensive to certain individuals. The closest sensitive receptors to the Project site are residences in El Segundo, located approximately 3,000 feet south of the Proposed Project site. Due to the temporary nature of construction activities, combined with variabilities in wind speed and direction as related to the dispersion of construction emissions and distances to nearby receptors, odors from construction-related diesel exhaust would not affect a substantial number of people. The Project site is located at LAX, which is characterized by airport operations, including aircraft movement, passenger transport and processing, and maintenance activities. The Proposed Project would result in the continuation of airport operations consistent with existing aircraft activity, passenger transport or processing, and maintenance activities at LAX and would not notably change existing odors at or in the vicinity of the Project site. Therefore, operation of the Proposed Project would not result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

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<sup>&</sup>lt;sup>18</sup> City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report, Los Angeles International Airport (LAX) Midfield Satellite Concourse,* June 2014.

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# 4.4 BIOLOGICAL RESOURCES

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				Х
b)	Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?				Х
c)	Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?				Х
d)	Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?				Х
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?				Х
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?				Х

# 4.4.1 DISCUSSION

The Proposed Project is located entirely on Airport property in an area that is fully developed with no significant biological resources. The Proposed Project would renovate and reconstruct an existing passenger concourse building that would operate in a manner consistent with existing conditions. The Proposed Project site does not contain riparian or other sensitive natural habitat, including Coastal Zone or wetlands. Additionally, the Proposed Project does not support habitat for sensitive or special status species and would not interfere with the movement of any migratory fish or wildlife species. The implementation of the Proposed Project would not conflict with any local policies or ordinances protecting biological resources. There are no trees at the Proposed Project site; therefore, no native trees protected by City of Los Angeles Ordinance No. 177404 would be impacted.<sup>19</sup>

The implementation of the Proposed Project would not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan. The Los Angeles Airport / El Segundo Dunes (Dunes) Specific Plan is applicable to the Dunes area immediately west of the Airport and approximately 7,000 feet southwest of the Proposed Project site.<sup>20</sup> The

<sup>&</sup>lt;sup>19</sup> City of Los Angeles, *Ordinance No. 177404, Protected Tree Relocation and Replacement*, effective April 23, 2006. https://planning.lacity.org/Code\_Studies/Other/ProtectedTreeOrd.pdf

<sup>&</sup>lt;sup>20</sup> City of Los Angeles, *Ordinance No. 167940*, *Los Angeles Airport / El Segundo Dunes Specific Plan*, effective June 28, 1992. https://planning.lacity.org/complan/specplan/pdf/laxdunes.pdf

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Dunes comprise approximately 300-acres of sand dune ecosystem that contains state-designated sensitive habitat for 11 rare species of flora and fauna.<sup>21,22</sup> However, due to the distance between the Proposed Project site and the Dunes, the Proposed Project would not impact the Dunes nor would it have a substantial adverse effect, either directly or through habitat modifications, on any species listed as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, by the California Department of Fish and Wildlife (CDFW), or by the US Fish and Wildlife Service (USFWS). The Proposed Project would have no impact on biological resources.

# 4.5 CULTURAL RESOURCES

WO	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?				Х
b)	Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?			Х	
c)	Disturb any human remains, including those interred outside of dedicated cemeteries?				Х

# 4.5.1 DISCUSSION (A)

The Proposed Project would be constructed on a completely developed portion of the Airport, within the CTA. There are no known historic resources within the T4 Concourse or the associated Ticketing Building. The Satellite and Ticketing Building were opened in the 1960's in succession with the other original satellite and ticketing buildings; however, substantial modifications and multiple renovations have occurred within and adjacent to T4 in the decades since and neither the Satellite or Ticketing Building are eligible as historic resources.<sup>23</sup> Five buildings, including Hangar One, the Theme Building, the 1961 Airport Traffic Control Tower, the Proud Bird Restaurant, and the Quonset Hut; one structure, the World War II Munitions Bunker; and one additional object, the Terminal 6 Tower Sign, have been identified for preservation on LAX property.

Hangar One is listed in the National Register of Historic Places (National Register) and California Register of Historical Resources (California Register).<sup>24</sup> The Theme Building was designated as a City of Los Angeles Historic Cultural Monument in 1993 and is eligible for listing in the National Register and California Register. The 1961 Airport Traffic Control Tower and the Terminal 6 Tower Sign are eligible for listing as City of Los Angeles Historic

<sup>&</sup>lt;sup>21</sup> City of Los Angeles, Department of City Planning, *Los Angeles International Airport, LAX Plan*, 2004. https://www.lawa.org/-/media/lawa-web/lawa-our-lax/finallaxplan\_092904.ashx

<sup>&</sup>lt;sup>22</sup> City of Los Angeles, *Ordinance No. 167940, Los Angeles Airport / El Segundo Dunes Specific Plan*, effective June 28, 1992. https://planning.lacity.org/complan/specplan/pdf/laxdunes.pdf

<sup>&</sup>lt;sup>23</sup> Historic Resources Group. *Los Angeles International Airport Preservation Plan*. Available: https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/plan-and-ordiance/2016-preservation-plan.pdf. September 2016.

<sup>24</sup> Historic Resources Group. Los Angeles International Airport Preservation Plan Available: https://lawamediastorage.blob.core.windows.net/lawa-media-files/media-files/lawa-web/lawa-our-lax/plan-and-ordiance/2016-preservation-plan.pdf. September 2016.

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Cultural Monuments. The Quonset Hut is eligible for listing in the National Register, California Register, and as a City of Los Angeles Historic Cultural Monument. The Proud Bird Restaurant has been recognized in the City of Los Angeles Historic Resources Survey as a contributor to the commercial development of the surrounding area and is eligible as a City of Los Angeles Monument. The World War II Munitions Storage Bunker is eligible for listing in the National Register and California Register as a potential contributor to a thematic district or group respectively. The Proposed Project would renovate and reconstruct portions of T4 at a scale similar to that of the existing T4 Concourse. Construction equipment would be restricted to the T4 Concourse area and would not result in significant obscuration of any building or structure identified for historic or cultural preservation. Therefore, neither construction nor operation of the Proposed Project would impact any of the elements identified for historic preservation.

The subgrade arrivals level tunnel between the Satellite building's vertical circulation stairs and the baggage carousels contains a mosaic tile mural, a remnant feature which is not eligible for consideration as an individual or contributing historic resource because it does not meet the necessary National Register, California Register, or local criteria for listing. The mosaic mural tunnel would not be altered or otherwise affected during construction of the Proposed Project and would remain in use following construction. The Proposed Project would not impact the significance of any historic resource at LAX.

# 4.5.2 DISCUSSION (B AND C)

An investigation of cultural resources completed for the 2004 LAX Master Plan revealed that within a radius of approximately 2 miles of the center of LAX proper, 36 archeological sites have been recorded, eight of which are located within the LAX property boundary.<sup>25</sup> None of the eight sites identified on LAX property are located within the boundaries of the Proposed Project site or in the immediate vicinity. The Project site is a highly disturbed area used for airport uses. Any resources that may have existed on the site at one time are likely to have been displaced and, as a result, the overall sensitivity of the site with respect to buried resources is low.

LAWA has developed and adopted plan, policies, and procedures that address potential impacts to archaeological resources, which are documented in LAWA's Archaeological Treatment Plan (ATP).<sup>26</sup> LAWA requires all construction projects at LAX to comply with the ATP and will apply this requirement to the Proposed Project. In the event human remains or other significant archeological resources are inadvertently discovered during construction, the contractor would stop work and notify LAWA representatives and follow the ATP, Native American Graves Protection and Repatriation Act provisions, and applicable state and local regulations. This includes the California Health and Safety Code Section 7050.5 which requires that in the event of discovery or recognition of any human remains, there shall be no further excavation until the coroner has made recommendations concerning the treatment and disposition of the human remains to the person responsible. If the coroner determines that the remains are not subject to Los Angeles County Coroner authority and has reason to believe that the discovery may be a tribal resource, the Los Angeles County Coroner shall contact the Native American Heritage Commission within 24 hours. Additionally, the San Gabriel Band of Mission Indians has requested and would receive notification prior to excavation associated with the Proposed Project. Given the lack of known cultural resources within the Proposed Project area and the

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<sup>&</sup>lt;sup>25</sup> City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Section 4.9.1 – Historic/Architectural and Archaeological/Cultural Resources, April 2004.

<sup>&</sup>lt;sup>26</sup> City of Los Angeles, Los Angeles World Airports, *Final LAX Master Plan Mitigation Monitoring & Reporting Program: Archaeological Treatment Plan, Available: https://www.lawa.org/-/media/lawa-web/lawa-our-lax/studies-and-reports/mitigation-monitoring/archaeological\_treatment\_plan.ashx?la=en&hash=9833B1960E1AE662518B5517DB42CA42F55FAE0E*, prepared by Brian F. Smith and Associates, June 2005.

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precautions in place to monitor for and respond to accidental discovery, the Proposed Project would have a less than significant impact on archeological resources or disturbance of human remains.

#### 4.6 ENERGY

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?			Х	
b)	Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?				Х

# 4.6.1 DISCUSSION

Construction of the proposed Project would consume energy in the form of electricity, natural gas, and transportation-related fuels, through use of construction equipment, transport of construction materials, temporary lighting, etc. However, the implementation of the Proposed Project is expected to decrease overall energy demand at T4. The physical environmental impacts associated with the burning of fuels for construction of the Proposed Project have been accounted for in Section 4.3, Air Quality, and Section 4.8, Greenhouse Gas Emissions. Fuels associated with construction are widely available. Additionally, all diesel-fueled construction equipment would be required to be fitted with the best available emission control devices and would be required to use renewable diesel fuel for at least 90 percent of fuel demand.<sup>27</sup> The U.S. Environmental Protection Agency (EPA) also sets emission standards for construction equipment. The current iteration of emissions standards for construction equipment are the 'Tier 4' efficiency requirements, which are described in 40 Code of Federal Regulations Parts 1039, 1065, and 1068 (originally adopted in 69 Federal Register 38958 [June 29, 2004], and most recently updated in 2014 [79 Federal Register 46356]). All diesel-powered equipment over 50 horsepower employed during construction of the Proposed Project would be Tier 4 equipment.

Construction materials used for the proposed T4 Concourse and airfield improvements must adhere to the specifications identified in the LAX Sustainable Design & Construction Requirements document, including a minimum amount of local and recycled materials. The Proposed Project would also be subject to Los Angeles Green Building Code Tier 1 conformance requirements and the City's Low Impact Development Ordinance for design and operation.

The Proposed Project would not increase the Airport's operational capacity. While the Proposed Project would be operated similar to the existing T4 Concourse, the updated design, materials, and building systems used for the Proposed Project are expected to reduce operational energy demands at T4. The existing structures and associated building systems comprising T4 are more than 20 years old and modern equivalent systems and materials are generally more energy efficient. In addition to adherence to the LAX Design Guidelines, the The Proposed Project would incorporate modern building materials and internal systems technology in accordance with the Los Angeles Green Building Code, Los Angeles Green New Deal, and LEED® Silver requirements, resulting in an increase in energy efficiency for T4 operations. Further, the Proposed Project is targeting a 12 to 14 percent increase in energy

<sup>&</sup>lt;sup>27</sup> Los Angeles World Airports. Los Angeles International Airport Sustainable Design & Construction Requirements. August 4, 2017.

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efficiency over baseline demand. To the extent possible, if approved by FAA, solar photovoltaic panels will be installed on the T4 roof, which would reduce energy demand even further and produce renewable energy credits.<sup>26</sup> Based on the energy efficiency requirements for construction of the Proposed Project and the modern materials and systems with which the Proposed Project would be developed, the implementation of the Proposed Project would not result in wasteful, inefficient, or unnecessary consumption of fuel or conflict with or obstruct any applicable renewable energy or energy efficiency plans. Construction of the Proposed Project would require use of renewable and non-renewable energy sources; however, the increase in energy demand would be temporary and construction would be completed consistent with LAWA Design and Construction Handbook requirements and LAWA sustainability requirements. The temporary closure of aircraft gates and displacement of operations at those gates to MSC, TBIT, or T5 would not substantially change aircraft taxi patterns or result in a significant change in jet fuel usage. Therefore, the Proposed Project would have a less than significant impact on energy.

<sup>&</sup>lt;sup>28</sup> Bartholomew, Brian D., PGAL. Email to Carter Atkins, LAWA, RE: Terminal 4 Sustainability. October 8, 2019.

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# 4.7 GEOLOGY/SOILS

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:  i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault?  ii. Strong seismic ground shaking?  iii. Seismic-related ground failure, including liquefaction?  iv. Landslides?			X	
b)	Result in substantial soil erosion or the loss of topsoil?				Х
c)	Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?				Х
d)	Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?			Х	
e)	Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?				Х
f)	Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?				Х

#### 4.7.1 DISCUSSION

The Proposed Project is located within the seismically active southern California region; however, the Proposed Project is not located within an Alquist-Priolo Fault Zone, and there is no evidence of faulting (displacement that occurs along the surface of a fault during an earthquake) at the site.<sup>29</sup> The nearest mapped fault, the Newport-Inglewood Fault Zone, is located approximately 3.6 miles from the Proposed Project site.<sup>30</sup> The Charnock Fault, a potentially active fault, may be located near or through the eastern portions of the Airport; however, this fault is not located at the Proposed Project site, and the potential for surface rupture associated with this fault is considered low.<sup>31</sup>

<sup>&</sup>lt;sup>29</sup> City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Technical Report, 12, Earth/Geology Technical Report, January 2001.

<sup>&</sup>lt;sup>30</sup> City of Los Angeles, Department of City Planning, ZIMAS, http://zimas.lacity.org/ (accessed August 29, 2019).

<sup>&</sup>lt;sup>31</sup> City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Technical Report, 12, Earth/Geology Technical Report, January 2001.

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As discussed in Section 2.1, the substructures within the existing Connector building, the Satellite, and the Satellite Extension are all seismically deficient. The design and construction of the Proposed Project would improve structural integrity and safety in comparison to existing conditions and would comply with current Los Angeles Building Code (LABC), California Building Standards Code (CBSC), and American Society of Civil Engineers (ASCE) codes and standards to reduce risks associated with fault rupture or strong seismic ground shaking. Additionally, all construction activities would comply with Occupational Safety and Health Administration (OSHA) and the Division of Occupational Safety and Health of California (Cal/OSHA) requirements. As such, the potential for substantial direct or indirect adverse effects resulting from rupture of a known earthquake fault or strong seismic ground shaking would be less than significant during construction and operation of the Proposed Project.

The Proposed Project would not be located on a geologic unit or soil that is unstable or that would become unstable as a result of the Proposed Project and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. The California Department of Conservation (CDC) has developed Seismic Hazard Zone maps which chart areas prone to liquefaction and earthquake-induced landslides. According to the Seismic Hazard Zone map for the Venice Quadrangle (within which the Proposed Project is located), no potential liquefaction zones are located at the Airport.<sup>32</sup> While the Dunes west of the Airport are located in a liquefaction zone, given the flat topography of the Proposed Project site and the distance from the Dunes, the Proposed Project's vicinity to the liquefaction zones would not pose a risk to the Proposed Project site.

The Proposed Project site is flat and surrounded by existing Airport development. The City of Los Angeles Landslide inventory and Hillside Areas map does not identify any areas near the Proposed Project that may contain unstable slopes which may be prone to seismically-produced landslides.<sup>33</sup>

The Proposed Project site has flat topography comprised entirely of impervious surfaces such as asphalt, concrete, and structures, and the Proposed Project would maintain this impervious character following construction. All construction would comply with LABC Sections 91.7000-91.7016, which include construction requirements for grading, excavation, and use of fill. In addition, an erosion control plan would be implemented before construction if grading exceeds 200 cubic yards and occurs between November and April. Construction would comply with the Municipal Separate Storm Sewer System (MS4) Construction General Permit which requires the preparation of a construction Storm Water Pollution Prevention Plan (SWPPP) and implementation of Best Management Practices (BMPs), including for erosion and sediment control for ground disturbance of an acre or more. Therefore, no significant soil erosion is expected to occur.

Fill materials such as clay and silt, in some portions of the Airport, could be prone to expansion, which could damage structural foundations and engineered structures.<sup>34</sup> The Proposed Project would be constructed in compliance with current LABC, CBSC, and ASCE requirements and would not result in any structural or engineering modifications that could increase exposure of people or structures to risks associated with expansive soils.

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<sup>&</sup>lt;sup>32</sup> State of California, Natural Resources Agency, Department of Conservation, *Earthquake Zones of Required Investigation, Venice Quadrangle, California Geological Survey*, March 25, 1999, http://gmw.conservation.ca.gov/SHP/EZRIM/Maps/VENICE.pdf.

<sup>33</sup> City of Los Angeles, Department of City Planning, Safety Element of the City of Los Angeles General Plan, Exhibit C, Landslide Inventory & Hillside Areas in the City of Los Angeles, November 1996. https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

<sup>&</sup>lt;sup>34</sup> City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Section 4.22 – Earth/Geology, April 2004; City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, Technical Report, 12, Earth/Geology Technical Report, January 2001.

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The Proposed Project site is located in a developed area where wastewater infrastructure is currently in place. The Proposed Project would use the existing wastewater infrastructure and would not use septic tanks or alternative wastewater disposal systems.

LAWA requires all construction at the Airport to comply with the Paleontological Management Treatment Plan (PMTP), which contains plans, policies, and procedures that address potential impacts to paleontological resources. The PMTP focuses on the identification, recovery, proper treatment, and long-term protection and archival conservation of expected and unexpected paleontological discoveries of federal, state, and/or local significance. As part of the PMTP, monitoring for any previously unknown paleontological resources would occur, and any and all discoveries would be handled pursuant to the PMTP. As the Proposed Project site has been previously disturbed and is currently developed, there is a low likelihood of encountering any paleontological discoveries of significance. However, in the event that paleontological deposits are encountered, the PMTP would be used as a guideline for the evaluation, recovery, treatment and archival conservation of such resources in a manner consistent with the generally accepted practices of the scientific paleontological community as well as the general intent and specifications of CEQA.

The Proposed Project would have a less-than-significant impact or no impact with regard to geology/soils.

#### 4.8 GREENHOUSE GAS EMISSIONS

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			Х	
b)	Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?				Х

#### 4.8.1 DISCUSSION

Gases that trap heat in the atmosphere are called GHGs. The major concern with GHGs is that increases in their concentrations are causing global climate change. Global climate change is a change in the average weather on Earth that can be measured by wind patterns, storms, precipitation, and temperature. Although there is disagreement as to the rate of global climate change and the extent of the impacts attributable to human activities, most in the scientific community agree that there is a direct link between increased emissions of GHGs and long-term global temperature increases.

The principal GHGs are carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), sulfur hexafluoride (SF6), perfluorocarbons (PFCs), and hydrofluorocarbons (HFCs). Because different GHGs have different global warming potentials (GWPs) and  $CO_2$  is the most common reference gas for climate change, GHG emissions are often quantified and reported as  $CO_2$  equivalents ( $CO_2$ e). For example, SF<sub>6</sub> is a GHG commonly used in the utility industry

<sup>&</sup>lt;sup>35</sup> Los Angeles World Airports, Environmental Management Division, LAX Master Plan Mitigation Monitoring & Reporting Program, Paleontological Management Treatment Plan, December 2005 (Revised). https://www.lawa.org/en/lawa-our-lax/studies-and-reports/mitigation-monitoring-reporting-program

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as an insulating gas in circuit breakers and other electronic equipment.  $SF_6$ , while comprising a small fraction of the total GHGs emitted annually worldwide, is a much more potent GHG with 22,800 times the GWP as  $CO_2$ . Therefore, an emission of 1 metric ton (MT) of  $SF_6$  could be reported as an emission of 22,800 MT of  $CO_2$ e (Intergovernmental Panel on Climate Change [IPCC] 2007). Large emissions sources are reported in million metric tons (MMT) of  $CO_2$ e (MMT  $CO_2$ e).

The Proposed Project would comprise partial demolition, renovation, and construction of an existing airport terminal facility at LAX. Greenhouse gas (GHG) emissions are generally identified as CO<sub>2</sub>, Methane (CH<sub>4</sub>), N<sub>2</sub>O, and fluorinated gases. CH<sub>4</sub> is generally associated with the production and transport of coal, natural gas, and oil or a derivative of agricultural processes and, as such, would not be generated during construction or operation of the Proposed Project<sup>36</sup>. Fluorinated gases are generally emitted in small amounts during a variety of industrial processes (e.g., refrigeration and aluminum and semiconductor manufacturing) not expected to take place during or as a result of the Proposed project at a significant scale.

As discussed in Section 4.3 of the Initial Study, construction of the Proposed Project would result in emissions from construction-related activities including use of on- and off-road equipment, worker commuting, materials delivery and haul trips, and application of architectural coatings. Emissions associated with construction of the Proposed Project were calculated and described in detail in Attachment 1. The Proposed Project would incorporate modern building materials and internal systems technology in accordance with the Los Angeles Green Building Code, Los Angeles Green New Deal, and LEED® Silver requirements, resulting in an increase in energy efficiency for T4 operations. Further, the Proposed Project is targeting a 12 to 14 percent increase in energy efficiency over baseline demand. To the extent possible, if approved by FAA, solar photovoltaic panels will be installed on the T4 roof, which would reduce energy demand even further and produce renewable energy credits.

The CalEEMod analysis of the proposed Project determined construction of the proposed Project would generate greenhouse gas (GHG) emissions as a result of construction vehicle traffic and the operation of construction equipment (see **Table 4-2**).

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<sup>&</sup>lt;sup>36</sup> U.S. Environmental Protection Agency. Overview of Greenhouse Gases (Available: https://www.epa.gov/ghgemissions/overview-greenhouse-gases). Accessed October 2019).

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TABLE 4-2: PROPOSED PROJECT CONSTRUCTION GREENHOUSE GAS EMISSIONS

YEAR	MT CO₂e
2021 (Demolition)	89
2022 (Demolition)	430
2023	265
2024	603
2025	144
2026	547
Total	2,078

NOTE:

MT CO<sub>2</sub>e—metric tons of CO<sub>2</sub> equivalent

SOURCE: Ricondo & Associates, Inc., January 2019

SCAQMD criteria for GHG emissions include direct, indirect, and, to the extent information is available, life cycle emissions during construction and operation<sup>37</sup>. Further, construction emissions are amortized over the life of the project, defined as 30 years, and added to operational emissions for comparison to the applicable GHG significance tier specified in the interim guidance. The existing facility does not generate direct GHG emissions, but does produce indirect emissions from energy use, heating, and cooling; once constructed the Proposed Project would produce similar indirect emissions. Based on an amortization rate of 30 years, the Proposed Project would generate 69.3 MT CO<sub>2</sub>e on an annual basis. However, with the 12 to 14 percent increase in energy efficiency over baseline demand, it is anticipated that these emissions would be offset resulting in either a decrease or no net increase in emissions over existing conditions.

Construction and operation of the Proposed Project would be consistent with the City of Los Angeles Green New Deal Sustainability Plan, which is directed towards reduction of GHG emissions and advancement of sustainable development within the City of Los Angeles, as well as the California Climate Change Scoping Plan, which is the state's strategy for meeting GHG reduction goals established by the Global Warming Solutions Act of 2006 (California Assembly Bill 32). Construction of the Proposed Project would be completed in accordance with LAWA Design and Construction Handbook guidelines and LAWA Sustainability Action Plan objectives, which are consistent with the City of Los Angeles Green New Deal Sustainability Plan,<sup>38</sup>

The Proposed Project would include installation of electrical vehicle infrastructure, use of recycled and sustainably sources building materials, implementation of sustainable building practices, and benefit from energy efficient design and building systems. LAX is currently certified at Level 2-*Reduction* by the Airport Carbon Accreditation Program,<sup>39</sup> and will continue to participate in the program to achieve LAWA's goal of reducing LAWA-controlled

<sup>&</sup>lt;sup>37</sup> South Coast Air Quality Management District. Interim CEQA GHG Significance Threshold for Stationary Sources, Rules and Plans. December 5, 2008.

Los Angeles World Airports. Sustainability Action Plan Update: BOAC July 18, 2019 Available: https://www.lawa.org/-/media/lawa-web/lawa-investor-relations/files/additional-resources/lawa-sustainability-action-plan-update-mgmt-report-071819-2.ashx?la=en&hash=89D493ED3AAB038D0CDE307DC72BD12E9355D94F. July 18, 2019.

<sup>&</sup>lt;sup>39</sup> Airport Carbon Accreditation is an independent, voluntary program administered by an international consultancy (WSP), appointed by Airports Council International Europe to enforce the accreditation criteria for airports on an annual basis.

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emissions by 45 percent below 1990 levels by 2025, and 80 percent by 2050. LAWA's participation in the Airport Carbon Accreditation Program and continued compliance with the LA Green New Deal, through the LAWA Design and Construction Handbook and sustainability efforts are consistent with state and local plans, policies, and regulations to reduce GHG. Thus, the Proposed Project would not conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

#### 4.9 HAZARDS AND HAZARDOUS MATERIALS

WO	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?			Х	
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?			X	
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?				Х
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?			Х	
e)	For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?			Х	
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?			Х	
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?				Х

#### 4.9.1 DISCUSSION – (A AND B)

The Proposed Project comprises partial demolition and reconstruction of an existing airport passenger concourse. Construction of the Proposed Project would involve the transport and use of hazardous materials; including diesel and gasoline, industrial solvents and cleaners, mechanical oils, and architectural coatings consistent with construction projects of similar scope and scale. These materials are not acutely hazardous, would be employed in relatively small amounts, and their storage and use are subject to the Occupational Health and Safety Act, Title 22 *Social Security* of the California Code of Regulations (Title 22), California Health and Safety Code regulations, and the LAWA Design and Construction Handbook requirements.

Additionally, previous investigations of the T4 apron area and underlying soil have produced evidence of fuel contamination concentrated around abandoned aviation fuel distribution pipeline, as described in greater detail under Section 4.9.3. Accordingly, excavation associated with the Proposed Action would likely result in the discovery

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of localized contaminated soils and airfield pavement. Due to the age of portions of the T4 Concourse structure, particularly the Satellite building, lead-based paint and asbestos may be encountered during demolition as well.

In 1992 the California Department of Toxic Substance Control (DTSC) was authorized by the EPA to implement the Resource Conservation and Recovery Act (RCRA) for the State of California, thereby establishing DTSC as the primary enforcement agency for RCRA requirements in California.<sup>40</sup> The RCRA establishes rules and regulations to protect human health and the environment; reduce waste and promote conservation of energy and natural resources; and reduce or eliminate the generation of hazardous waste. The RCRA and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund) comprise the two most prominent federal statutes with which the Proposed Project would comply. The RCRA governs the generation, treatment, storage, and disposal of hazardous wastes. CERCLA regulates cleanup of hazardous substance (excluding petroleum) release in the environment. Hazardous materials are also regulated by the CAA, the Clean Water Act (CWA), the Safe Drinking Water Act, the Hazardous Materials Transportation Act, and the Emergency Planning and Community Right to Know Act.

Applicable to the Proposed Project, the DTSC enforces regulatory requirements specified in Title 22, Division 4.5 *Environmental Health Standards for the Management of Hazardous Waste* and California Health and Safety Code Division 20 *Miscellaneous Health and Safety Provisions* and Division 37 *Regulation of Environmental Protection.*<sup>41</sup> The DTSC provisions regulate the testing, transport, storage, and disposal of hazardous waste and hazardous substances in accordance with state and federal requirements. Additionally, construction of the Proposed Project would comply with the LAWA Design and Construction Handbook Section 01 66 13, which specifies procedures for identifying, recovering, and disposing of hazardous waste and storage and handling requirements for hazardous materials.<sup>42</sup>

Compliance with existing federal, state, and local regulations and applicable BMPs would minimize the potential for accidental release of hazardous materials and ensure the appropriate response measures are in place to address an accident should one occur. Demolished materials would be tested for hazardous materials, including, hydrocarbons, asbestos, and lead-based paint, and classified for transport to an appropriate off-site facility for disposal in accordance with SCAQMD Rule 1403, the LAWA Guidance Manual for Construction Storm Water Pollution Prevention, as well as all other applicable state and federal regulations. The LAWA Guidance Manual for Construction Storm Water Pollution Prevention provides direction on minimizing or eliminating the potential for construction activity to pollute stormwater in and around a given project site. SCAQMD Rule 1403 specifies work practices to limit asbestos emissions from building demolition and renovation activities including the removal and disturbance of asbestos-containing material (ACM). This rule is generally designed to protect uses surrounding demolition or renovation activities from exposure to asbestos emissions.

Regulations to manage and control exposure to lead-based paint are described in CFR Title 29, Section 1926.62 and CCR Title 8 Section 1532.1. These regulations cover the demolition, removal, cleanup, transportation, storage, and disposal of lead-containing material. The regulations outline the permissible exposure limit, protective measures, monitoring, and compliance requirements to ensure the safety of construction workers exposed to lead-based materials. In accordance with the Design and Construction Handbook, lead-based paint found during renovation or

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<sup>&</sup>lt;sup>40</sup> California Department of Toxic Substance Control. Resource Conservation and Recovery Act webpage Available: https://dtsc.ca.gov/resource-conservation-recovery-act-rcra/. Accessed October 14, 2019.

<sup>&</sup>lt;sup>41</sup> California Department of Toxic Substance Control. 2018 California Hazardous Waste and Hazardous Substance Law Code Excerpts. January 2019.

<sup>&</sup>lt;sup>42</sup> Los Angeles World Airports. 2019 Design and Construction Handbook. July 31, 2019.

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demolition would require abatement by licensed contractors in accordance with EPA, Cal/OSHA, and Los Angeles County regulations.

Construction of the Proposed Project would be conducted in compliance with applicable federal, state, and local regulations for storage, use, transport, and disposal of hazardous materials and hazardous waste. Operation of the Proposed Project would be consistent with existing conditions and would, therefore, not result in a significant hazard to the public or the environment through routine transport, use, or disposal of hazardous materials or create a significant hazard due to accidental release of hazardous materials or hazardous waste. The impact to public safety and the environment as a result of hazardous materials associated with the Proposed Project would be less than significant, and no mitigation is required.

# 4.9.2 DISCUSSION – (C)

There are no schools located or proposed within one-quarter mile of the Proposed Project. Therefore, no impacts related to hazardous emissions or handling of hazard materials, substances, or waste in proximity to an existing or proposed school would occur during construction or operation of the Proposed Project.

# 4.9.3 DISCUSSION – (D)

An Environmental Data Resources (EDR) database review, pursuant to Government Code Section 65962.5, was performed as part of a Hazardous Materials Assessment for the Landside Access Modernization Program (LAMP) in 2015. The EDR report includes federal, state, and local database records of properties of environmental concern, regulatory status of the facilities, and potential environmental impact to the subject site. Ten sites within or in proximity to the CTA were listed on the RCRA Generator database as large or small quantity generators; however, none of these sites were considered an environmental concern to the LAMP project, nor are any of the sites within the Proposed Project site.

Per the State of California Water Geotracker Website, which includes leaking underground storage tank (LUST) sites, cleanup assessments are underway for one site at Terminal 2 and two sites at Terminal 6. A remediation program is currently underway for the Allied Signal (Park One) facility at 9851 Sepulveda Blvd, approximately one mile east of the Proposed Project site<sup>43</sup>. None of the Airport sites identified on GeoTracker would impact construction or operation of the Proposed Project. There are no sites within or adjacent to the Proposed Project site that were determined to represent potential environmental concerns for the project per federal or state databases<sup>44</sup>.

The EDR review was supplemented by site assessment documents specific to T4, which identify instances of known total petroleum hydrocarbon (TPH) contamination related to the previous T4 aviation fuel hydrant system. Soil investigations within the T4 apron were performed in 2003 and 2004, during a series of maintenance projects associated with the aviation fuel hydrant system, and in 2011 prior to replacement of the fuel hydrant system. TPH contamination has been verified at several locations within the T4 apron immediately adjacent to the abandoned fuel hydrant and pipeline locations within the apron pavement.<sup>45</sup> The vertical and lateral extents of the contamination have been recorded and the sources of previous contamination (old hydrant pits) have been removed. A minimum of 20 feet of clean soil exists between the impacted soil and shallow groundwater below T4; therefore, remediation of impacted soils beneath and in the vicinity of T4 was determined to be unwarranted.

<sup>&</sup>lt;sup>43</sup> California State Water Resources Control Board. GeoTracker Map. Accessed September 17, 2019

<sup>&</sup>lt;sup>44</sup> Ninyo & Moore. Hazardous Materials Assessment for the Landside Access Modernization Program. September 9, 2015.

<sup>&</sup>lt;sup>45</sup> Arcadis. Terminal 4 Fuel Hydrant Line Abandonment, Los Angeles International Airport, Los Angeles, California. June 21, 2012.

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The Proposed Project would require excavation within portions of the T4 apron and T4 Concourse and relocation of multiple fuel hydrant pits. Based on previous soil investigations of the T4 apron, it is likely localized contaminated soils would be encountered during demolition and construction activity. Compliance with federal and state regulations and the LAX Rules and Regulations would be required during construction of the Proposed Project. For any release of hazardous waste or hazardous constituents, the human health risk assessment calculations and corrective action would comply with Title 22, Sections 69021 and 69022. Treatment, storage, and disposal of hazardous waste, including contaminated soils and groundwater, would be conducted in compliance with Title 22, Section 66262. Additionally, any required soil or groundwater remediation would be done in accordance with the EPA's BMPs for Soil Treatment Technologies. Compliance would require preparation of detailed response plans for contaminated soil encountered during construction, as well as preparation of health and safety and soil management plans to ensure excavated soils are tested, segregated, and disposed of in accordance with applicable state and federal regulations per the Environmental Procedures (Section 01 35 43) identified in the LAWA Design and Construction Handbook. Previous investigations of the fuel hydrant system at LAX have verified contamination in the immediate vicinity of abandoned hydrant fuel pipelines with limited migration. Due to the limited amount of known soil contamination and extent of previous investigation, it is unlikely excavation activity for the Proposed Project would result in the exposure of significant quantities of contaminated soil or groundwater.

Remediation of contamination has the potential to expose workers to hazardous materials. Development and approval of a plan for removal of volatile organic compounds (VOCs) are required under SCAQMD Rule 1166.46 Provisions for worker health and safety would be mandated by and regulated through OHSA and Cal/OSHA, which include exposure limits for construction staff, identification of proper protective equipment, training guidance, and emergency and medical response requirements.

Compliance with EPA BMPs and federal, state, and local regulatory requirements governing remediation of contaminated materials would ensure that construction and operation of the proposed project on a site with known contaminates would not create a significant hazard to the public or the environment. Impacts associated with the Proposed Project's creation of hazards to the public or the environment would be less than significant.

#### 4.9.4 DISCUSSION – (E)

The Proposed Project would be located within a large hub commercial airport. LAX must operate in compliance with federal, state, and local laws and regulations that ensure Airport activities minimize the potential for impacts to the public and the environment. FAA design guidelines and the City of Los Angeles Ordinance No. 132,319 regulate building heights within and adjacent to the Airport to eliminate obstacles that may interfere with aircraft operations. Additionally, the City of Los Angeles land use and zoning regulations ensure planned and existing uses adjacent to the Airport are consistent with Airport operations. All construction activities would comply with applicable aviation-related safeguards, including FAA construction coordination and vetting requirements (14 CFR Part 77), and would, therefore, not create any safety hazard. The proposed improvements would be constructed below applicable FAA navigational surface thresholds and would, therefore, not result in an operational safety hazard. Construction activity would not substantially increase ambient noise at LAX due to the high ambient noise levels associated with Airport operations. Operation of the Proposed Project would not result in any significant changes to aircraft procedures on the AOA, increase the number of aircraft operations at LAX, or otherwise result in a change to the noise contours within and adjacent to LAX associated with the regular operation of aircraft. Impacts

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<sup>&</sup>lt;sup>46</sup> SCAQMD Rule 1166, Available: http://www.agmd.gov/docs/default-source/rule-book/reg-xi/rule-1166.pdf?sfvrsn=4

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to safety for people residing near or working in or near the Proposed Project area would be less than significant and no mitigation is required. For discussion of noise, please see Section 4.13.

#### 4.9.5 DISCUSSION – (F)

LAWA and tenants of LAX maintain emergency response and evacuation plans to minimize the potential for and the effects of an accident or other emergency. Construction of the Proposed Project is not anticipated to result in any closures to local Airport circulation roads or lanes within the CTA. During construction, emergency access routes to and from the Proposed Project site would remain open per FAA Advisory Circular (AC) No. 150/370-10H, State Fire Code Part II – *General Safety Provisions*, and Chapter 33 - *Fire Safety During Construction and Demolition* of Los Angeles City Fire Code regulations. Following construction of the Proposed Project, operation of T4 would generally be consistent with existing conditions. The Proposed Project would not result in an increase in passengers or number of aircraft served at the terminal.

Emergency access to and response plans for T4 would be updated, and potentially enhanced, based on the new structure and associated safety systems in accordance with the California Building Standards Code, Part II - General Safety Provisions, of the California Fire Code and Chapters 5-11 and 20 of the Los Angeles City Fire Code. The construction staging areas would comply with LAWA Design and Construction Handbook and FAA AC 150/5370-10 guidelines and procedures to limit the impacts of construction at the Airport, including the potential to affect emergency response. Per the LAWA Design and Construction Handbook, the contractor would be required to produce and adhere to a Site Logistics Plan, which would specify emergency vehicle access provisions and evacuation routes, and provide formal Emergency Instructions upon completion of construction identifying they types of emergencies that could affect the improved T4 Concourse and methodology for addressing the systems and structures associated with each emergency type. 47 An Emergency Contractor Quality Control Program, including a laydown plan, would be suggested in accordance with Part 2 - General Construction Items, to support adherence to pertinent NFPA requirements associated with specific material and activity regulations identified in FAA AC 150/5370-10 would be required. Construction staging activity would not affect emergency plans for or access to surrounding land uses. Therefore, impacts to emergency response or evacuation plans related to the proposed construction activity would be less than significant. The Proposed Project would construct T4 to modern fire, building, and seismic code standards, thereby improving operational safety at and adjacent to T4. Ongoing operation of the Proposed Project would not impact emergency response or evacuation plans and may ultimately enhance human safety at T4.

#### 4.9.6 DISCUSSION – (G)

The Proposed Project site is located within a developed airport and surrounded immediately by other airport uses on the airfield or within the CTA. Beyond the Airport are urbanized uses, to the north, south, and east, and the Pacific Ocean to the west. There are no fire hazard areas containing flammable brush, grass, or trees present on or near the Proposed Project site. Furthermore, the project site is not within a City of Los Angeles Wildfire Hazard Area, as delineated in the Safety Element of the General Plan.<sup>48</sup>

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<sup>&</sup>lt;sup>47</sup> Los Angeles World Airports. 2019 Design and Construction Handbook. July 31, 2019.

<sup>&</sup>lt;sup>48</sup> City of Los Angeles. Safety Element of the City of Los Angeles General Plan: Exhibit D – Selected Wildfire Hazard Areas in the City of Los Angeles. April 1996.

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#### 4.10 HYDROLOGY/WATER QUALITY

WC	OULD TH	IE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	require	any water quality standards or waste discharge ements or otherwise substantially degrade surface or d water quality?			Х	
b)	substar	ntially decrease groundwater supplies or interfere ntially with groundwater recharge such that the project apede sustainable groundwater management of the	Х			
c)	includii river, o	ntially alter the existing drainage pattern of a site or area, ng through the alteration of the course of a stream or r through the addition of impervious surfaces, in a r that would:			Х	
	(i)	Result in substantial erosion or siltation on- or off-site;			X	
	(ii)	Substantially increase the rate or amount of surface runoff in a manner which would result in flooding onor off-site;			Х	
	(iii)	Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or			Х	
	(iv)	Impede or redirect flood flows?				Х
d)		d hazard, tsunami, or seiche zones, risk release of nts due to project inundation?				Х
e)	Conflic control	t with or obstruct implementation of a water quality plan or sustainable groundwater management plan?				Х

#### 4.10.1 DISCUSSION

The Proposed Project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality. The Clean Water Act (CWA) requires that any discharge of pollutants to waters of the United States from any point source comply with a National Pollutant Discharge Elimination System (NPDES) permit. In 2001 (and since amended), the Los Angeles Regional Water Quality Control Board (LARWQCB)<sup>49</sup> issued NPDES Permit No. CAS004001 which covers the majority of Los Angeles County, including the Airport.<sup>50</sup> Additionally, construction activities at the Airport are subject to the requirements of the State

<sup>&</sup>lt;sup>49</sup> California Water Boards, Los Angeles Regional Water Quality Control Board, https://www.waterboards.ca.gov/losangeles/ (accessed August 14, 2019).

California Regional Water Quality Control Board, Los Angeles Region, Order No. 01-182, NPDES Permit No. CA004001. https://www.waterboards.ca.gov/losangeles/water\_issues/programs/stormwater/municipal/ms4\_permits/los\_angeles/2001-2007/LA\_MS4\_Permit2001-2007.pdf

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Construction General Permit (State Water Resources Control Board [SWRCB] Order No. 2009-0009-DWQ),<sup>51</sup> which lists the requirements for the protection of surface water quality during construction activities involving more than one acre of ground disturbance.

Any project that disturbs an area of more than one acre requires a Notice of Intent (NOI) to discharge under the General Permit for Construction and preparation of a project-specific SWPPP. The SWPPP includes measures to eliminate or reduce pollutant discharges and describes the implementation and maintenance of BMPs to control stormwater and other runoff during and after construction. The SWPPP is required to include a menu of BMPs to be selected and implemented based on the phase of construction and the weather conditions to effectively control erosion, sediment, and other construction related pollutants to meet the best available technology economically achievable and best conventional pollutant control technology standards. Erosion control BMPs are designed to prevent erosion, whereas sediment controls are designed to trap sediment once it has been mobilized. The SWPPP for the Proposed Project would be developed in accordance with LAWA's Guidance Manual for Construction Storm Water Pollution Prevention to ensure compliance with the Construction General Permit.<sup>52</sup> Additionally, activities and potential pollutant discharges associated with operations at the Airport are regulated by the State Industrial General Permit (SWRCB NPDES Order No. CAS000001).<sup>53</sup> LAWA currently has a SWPPP that addresses industrial activities at the Airport.<sup>54</sup>

Given that the existing Proposed Project site is fully developed with structures and impervious surfaces, the Proposed Project would not result in a substantial increase in the amount of impervious surface on the Proposed Project site nor would the Proposed Project rely on or otherwise impact groundwater sources. Therefore, the Proposed Project would not substantially decrease groundwater supplies or interfere with groundwater recharge.

The Proposed Project is not located near any streams or rivers, and the site is currently fully covered with structures and impervious surfaces. Implementation of the Proposed Project would not alter drainage patterns of the site; would not result in substantial erosion of siltation on- or off-site; would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site; would not create or contribute runoff water which would exceed the capacity of existing storm water drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows.

The Proposed Project site is not located within a floodplain per Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map data.<sup>55</sup> A majority of LAX property, including the Proposed Project site and the surrounding CTA, is designated Flood Zone X, which FEMA defines as an area of "minimal flooding." T4 is outside

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<sup>&</sup>lt;sup>51</sup> California State Water Resources Control Board, National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Associated with Construction and Land Disturbance Activities, Adopted Order No. 2009-0009-DWQ, as amended by 2010-0014-DWQ and 2012-0006-DWQ, NPDES No. CAS000002, July 17, 2012. https://www.waterboards.ca.gov/water\_issues/programs/stormwater/constpermits.shtml

<sup>&</sup>lt;sup>52</sup> City of Los Angeles, Los Angeles World Airports, *Guidance Manual for Construction Storm Water Pollution Prevention*, November 2015. https://www.lawa.org/-/media/lawa-web/environment/files/final-master-lawa-guidance-manual.ashx?la=en&hash=CCD2CA149DAEEA1E8E4DD4A419A0FD7340CA87DD

<sup>&</sup>lt;sup>53</sup> California State Water Resources Control Board, *National Pollutant Discharge Elimination System (NPDES) General Permit for Storm Water Discharges Associated with Industrial Activities*, Adopted Order No. 2014-0057-DWQ, NPDES No. CAS000001, Adopted April 1, 2014 and Amended August 4, 2015. https://www.waterboards.ca.gov/water\_issues/programs/stormwater/igp\_20140057dwq.shtml

<sup>&</sup>lt;sup>54</sup> City of Los Angeles, Los Angeles World Airports, *Storm Water Pollution Prevention Plan (SWPPP) Associated with Industrial Activities for Los Angeles International Airport*, January 18, 2018.

<sup>55</sup> Federal Emergency Management Agency, Flood Insurance Rate Map No. 06037C176OF, September 26, 2008.

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of a Special Flood Hazard Area and the 100-year flood zone. The Proposed Project site is approximately 1.85 miles from the Pacific Ocean and is not delineated as a potential inundation or tsunami impacted area on the City of Los Angeles Inundation and Tsunami Hazard Areas map.<sup>56</sup>

Implementation of the Proposed Project would comply with the existing regulatory programs and requirements designed to meet water quality standards and water discharge requirements. Based on compliance with these requirements, the Proposed Project would not conflict with or obstruct the implementation of applicable water quality control plans and regulations. Additionally, the Proposed Project would not rely on or otherwise impact groundwater supplies or result in a substantial increase in the amount of impervious surface at the site. Therefore, the Proposed Project would not conflict with or obstruct the implementation of a sustainable groundwater management plan. Impacts under thresholds (a) through (e) would be less than significant.

#### 4.11 LAND USE AND PLANNING

WC	OULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Physically divide an established community?				Χ
b)	Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?				Х

#### 4.11.1 DISCUSSION

The implementation of the Proposed Project would not disrupt or physically divide an established community. The Proposed Project site is located entirely within existing Airport property, and no acquisition of additional property would be required.

The implementation of the Proposed Project would not cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect. According to the City of Los Angeles Department of City Planning, the existing zoning for the Proposed Project site is LAX Zone.<sup>57</sup> Land use designations and development regulations applicable to the Airport include the LAX Plan, the LAX Specific Plan, and the Los Angeles County Airport Land Use Plan. The Proposed Project's relationship to these plans is described below:

The LAX Plan<sup>58</sup> is a component of the City of Los Angeles General Plan. The LAX Plan promotes, "an arrangement of airport uses that encourages and contributes the modernization of the airport..." According to the LAX Plan, the Proposed Project site is located in areas zoned for Airport Airside. In Airport Airside zones, development shall "Develop a balanced airfield to provide for more efficient and effective use of airport facilities," among other

<sup>&</sup>lt;sup>56</sup> City of Los Angeles, Department of City Planning, *Safety Element of the City of Los Angeles General Plan*, Exhibit G, Inundation & Tsunami Hazard Areas in the City of Los Angeles, March 1994. https://planning.lacity.org/cwd/gnlpln/saftyelt.pdf

<sup>&</sup>lt;sup>57</sup> City of Los Angeles, Department of City Planning, ZIMAS, http://zimas.lacity.org/ (accessed August 29, 2019).

<sup>&</sup>lt;sup>58</sup> City of Los Angeles, Department of City Planning, Los Angeles International Airport, LAX Plan, 2004. https://www.lawa.org/-/media/lawa-web/lawa-our-lax/finallaxplan\_092904.ashx

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items. The construction and implementation of the Proposed Project would not change the existing use of the Proposed Project site and would modernize and improve the efficiency of the existing facility, and therefore, would be consistent with this document.

- The LAX Specific Plan<sup>59</sup> provides zoning and development regulations for the Airport. According to the LAX Specific Plan, the Proposed Project site is located in the LAX Zone and Airport Airside subarea. The construction and implementation of the Proposed Project would not change the existing use of the Proposed Project site, and therefore, would be consistent with this document.
- The Los Angeles County Airport Land Use Plan<sup>60</sup> is intended to protect public health, safety, and welfare by ensuring the orderly expansion of airports and the adoption of land use measures that minimize the public's exposure to excessive noise and safety hazards within areas around public use airports. The construction and implementation of the Proposed Project would not change the existing use of the Proposed Project site or Airport operations, and therefore, would not conflict with this document.

The land use and zoning designation for the Proposed Project site would not change, and land uses would remain unchanged.

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<sup>&</sup>lt;sup>59</sup> City of Los Angeles, Los Angeles International Airport (LAX) Specific Plan, Ordinance No. 176,345, September 11, 2017 (Amended).

<sup>&</sup>lt;sup>60</sup> Los Angeles County, Airport Land Use Commission, *Los Angeles County Airport Land Use Plan*, December 19, 1991, revised December 1, 2014. http://planning.lacounty.gov/assets/upl/data/pd\_alup.pdf

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#### 4.12 MINERAL RESOURCES

WO	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?				Х
b)	Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?				Х

#### 4.12.1 DISCUSSION

The Proposed Project site is developed with airport-related uses. The site is paved or covered with buildings. There are no actively mined mineral or timber resources on or near the Proposed Project site, nor is the site available for mineral resource extraction given the existing land uses.

#### 4.13 NOISE

wo	ULD THE PROJECT RESULT IN:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?			X	
b)	Generation of excessive groundborne vibration or groundborne noise levels?			Х	
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?				Х

#### 4.13.1 DISCUSSION

The Proposed Project involves the modernization of the existing Terminal 4 Concourse and adjacent apron area. The Proposed Project site is within a large-hub international airport with existing sources of significant noise, including aviation and traffic noise. The Proposed Project would result in a temporary increase of noise and vibration levels at the project site during construction as a result of operation of construction equipment. Measurable increases in construction related traffic noise vary depending on the traffic conditions of the roadway, ambient noise within and around the project site, and type of construction equipment. For planning and preliminary analysis purposes, a traffic and transportation technical study was conducted in part to determine the likelihood of construction traffic-related impacts (see **Attachment 2**).

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The Proposed Project construction haul routes are on roadways with traffic conditions operating at a level of service A or B (see Attachment 2 for greater detail). Under these conditions sound levels increase at a rate of 3 dBA per doubling of traffic volume. Based on estimated increases in traffic volume due to construction, noise impacts from construction-related traffic would be minimal (less than 3 dBA) and would be consistent with the existing noise environment. Construction equipment noise levels vary by equipment type, but typically range from approximately 69 dBA up to 95 dBA at 50 feet. In comparison, a typical aircraft jet engine, with which most commercial aircraft are equipped, produce noise levels of up to 140 dBA at a distance of 100 ft.<sup>61</sup> The Proposed Project site is within the Airport's 75 dBA community noise equivalent level (CNEL) contour, which is the average noise level over a 24-hour period.<sup>62</sup> The use of construction equipment would be used on a temporary and intermittent basis, would not result in substantial increases to the noise environment, and would be consistent with existing noise levels at the Airport and surrounding roadways.

Some aircraft would temporarily operate at gates at MSC, TBIT, or T5 during Project construction. All of these gates lie within the 75 dBA CNEL contour. Potential aircraft taxiway noise effects that could result from shifting aircraft operations from other terminals to the MSC was analyzed as part of the MSC EIR<sup>63</sup>, and found to be less than significant assuming aircraft operations at 11 gates at MSC. The Proposed Project would temporarily shift operations from up to 7 gates to MSC; based on the analysis contained in the MSC EIR, the shift in aircraft operations would not result in a significant increase in aircraft taxi noise.

Noise levels from outdoor construction activities, independent of background ambient noise levels, indicate that the noisiest phases of construction are typically during excavation and grading, and that the noise level from equipment with mufflers is typically 86 dBA<sup>64</sup> L<sub>eq</sub><sup>65</sup> at 50 feet from the noise source. As described in Section 4.1.2.4 of the LAX Master Plan EIR, this type of sound typically dissipates at a rate of 4.5 dBA to 6.0 dBA for each doubling of distance. Using a conservative attenuation rate, a sound level of 86 dBA at 50 feet from the noise source would be approximately 81.5 dBA at a distance of 100 feet, 77 dBA at a distance of 200 feet, and so on. That sound drop-off rate does not take into account any intervening shielding or barriers such as structures or hills between the noise source and noise receptor.

Construction of the Proposed Project would occur in an area generally removed from the communities near LAX. The nearest noise-sensitive land use is residential development approximately 3,000 feet to the south in El Segundo. Based on a noise attenuation rate of 4.5 dBA per doubling of distance, the noise levels from construction activities within the T4 Project site would be approximately 59.2 dBA L<sub>eq</sub> at the residential area in El Segundo. The existing daytime ambient noise level at the nearest sensitive receptor (i.e., residential development in El Segundo south of Imperial Avenue) is between approximately 65 and 70 dBA L<sub>eq</sub>, 66 with the nighttime ambient noise level being approximately 5 dBA lower. Thus, the noise level from construction activity would be below the ambient noise levels

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<sup>&</sup>lt;sup>61</sup> Yale University. Decibel Level Comparison Chart Available: https://ehs.yale.edu/sites/default/files/files/decibel-level-chart.pdf. October 16, 2019.

<sup>&</sup>lt;sup>62</sup> Los Angeles World Airports. California State Airport Noise Standards Quarterly Report (2Q19) for Los Angeles International Airport. July 31, 2019.

<sup>&</sup>lt;sup>63</sup> City of Los Angeles, Los Angeles World Airports, Final Environmental Impact Report, Los Angeles International Airport (LAX) Midfield Satellite Concourse, June 2014.

 $<sup>^{64}</sup>$  dBA: A-weighted decibels are an expression of the relative loudness of sounds as perceived by the human ear.

<sup>65</sup> Leg (Equivalent Noise Level) is a measure used to express the average sound level (typically expressed in dBA) over a given period of time.

<sup>&</sup>lt;sup>66</sup> City of Los Angeles, Los Angeles World Airports (LAWA), LAWA Noise Management, <u>California State Airport Noise Standards Quarterly Report. 3Q11</u>, available at: http://lawa.org/uploadedFiles/LAX/pdf/lax3Q11 noise contour map.pdf. Accessed on August 27, 2012.

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and would, therefore, have no impact on persons residing or working in proximity to the Proposed Project. The CEQA threshold for a significant impact is a 5 dBA increase over ambient noise levels.

Construction staging for the Proposed Project would occur on the Project site and on Airport property between Westchester Parkway and Lincoln Boulevard, approximately 0.8 miles northeast of the Proposed Project site, and at the intersection of South La Tijera Boulevard and Westchester Parkway, approximately 1 mile northeast of the Proposed Project site. Based on a typical mix of construction equipment anticipated to be used for the Proposed Project, noise levels at the construction staging areas would be expected to be approximately 69 dBA L<sub>eq</sub>. Noise levels associated with construction traffic parking at these sites would be lower.<sup>67</sup> These noise levels would not exceed ambient noise levels by 5 dBA or more at a sensitive noise use. Based on the existing ambient noise levels of an active airfield and the distance to sensitive receptors, it is not anticipated that noise generated from construction of the Proposed Project would result in a substantial temporary increase in ambient noise levels, or excessive ground-borne vibration or noise.

Operation of the Proposed Project would not generate any additional noise, nor would it result in an increase aircraft or passenger capacity at LAX. Therefore, implementation of the Proposed Project would not: expose persons to or generate noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies; expose people to or generate excessive groundborne vibration or groundborne noise levels; create a substantial permanent increase in ambient noise levels in the Proposed Project site vicinity above levels existing without the Proposed Project; or, create a substantial temporary or periodic increase in ambient noise levels in the Project vicinity above levels existing. The impact is less than significant.

#### 4.14 POPULATION/HOUSING

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?				Х
b)	Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?				Х

#### 4.14.1 DISCUSSION

Implementation of the Proposed Project would not induce substantial unplanned population growth in any area, either directly or indirectly, or displace substantial numbers of existing people or housing. There are no existing residential properties at the Proposed Project site, and the Proposed Project does not include any residential development. The renovated and/or reconstructed Terminal 4 would contain existing and similar business operations that exist today.

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<sup>&</sup>lt;sup>67</sup> City of Los Angeles, Los Angeles World Airports (LAWA), <u>Final Environmental Impact Report, Los Angeles International Airport (LAX) Bradley West Project</u>, Section 4.8, September 2009.

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According to the construction traffic analysis conducted as part of the evaluation of the Proposed Project, the Proposed Project would create approximately 100 new jobs during peak construction; however, the number of jobs created over the full construction period would likely be more than those created during peak construction. While the construction and implementation of the Proposed Project would generate jobs, it is expected that these jobs would be filled using local labor and would not require workers to relocate. Furthermore, given that construction of all Proposed Project elements is assumed to begin in 2021 and be completed by 2026, the construction jobs created would be temporary in nature. Due to the employment patterns of construction workers in Southern California and the size of the Southern California labor force, construction workers are not likely to relocate. The construction and operation of the Proposed Project would not result in any increase in population; therefore, no impact would occur.

#### 4.15 PUBLIC SERVICES

wo	ULD THE P	PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	associated altered go physically construction environment acceptable	substantial adverse physical impacts d with the provision of new or physically overnmental facilities, need for new or altered governmental facilities, the on of which could cause significant ental impacts, in order to maintain e service ratios, response times, or other nee objectives for any of the following public				
	i.	Fire protection?				Х
	ii.	Police protection?				Х
	iii.	Schools?				Х
	iv.	Parks?				Х

#### 4.15.1 DISCUSSION (I AND II)

The City of Los Angeles Fire Department (LAFD) provides fire protection services throughout LAX. Four fire stations are located at LAX; Fire Station Nos. 5, 51, 80, and 95. Fire Station Nos. 80 and 51 are airfield rescue and fire fighting (ARFF) facilities, which are built on and have direct access to the air operations area (AOA). Fire Station Nos. 5 and 95, 0.92 miles north and 1.45 miles east of T4 respectively, are not adjacent to the AOA. Access to the Proposed Project site would be maintained throughout construction and construction activities would not impede fire response access to adjacent areas of the AOA and CTA in accordance with FAA Advisory Circular 150/5370-2F, Operational Safety on Airports During Construction. The Proposed Project would comply with all applicable LAWA, City, state, and federal fire codes and ordinance. The T4 Modernization Project would not increase operational capacity of the Airport and the improvements would serve passenger and air traffic levels in a manner and location consistent with the existing T4 Concourse. The Proposed Project would not alter emergency access routes or increase the number of facilities at LAX that would require fire protection. As discussed in Section 2.2, the Proposed Project would replace existing facilities and utilities with modern facilities and equipment which are constructed to modern building and fire code requirements, thereby improving safety in comparison to the existing structures.

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Improvements would include upgrades to the storm drain system, which will include modifications to the slopes surrounding the T4 Concourse, and relocation and replacement of inlets to meet current National Fire Protection Association requirements. The Proposed Project would be built in accordance with LAX Design Guidelines and would meet requirements for LEED® Silver certification. Therefore, the Proposed Project would have no impact on fire safety provisions at LAX.

The Los Angeles World Airports Police Division, the City of Los Angeles Police Department LAX Detail, and the Los Angeles Police Department provide police service at LAX and the surrounding areas. Demand for on-airport police service is typically based on passenger levels and number of facilities requiring coverage. The Proposed Project would not result in an increase in passengers at LAX and the increased in facility space resulting from the proposed improvements would be relatively minor. Construction of the Proposed Project would be completed in accordance with applicable federal, state, and local regulations and would not inhibit police access to the T4 Concourse or the adjacent AOA. As with fire protection services, the Proposed Project would not alter emergency access or increase the number of buildings at LAX that would require police coverage. Therefore, the Proposed Project would have no impact on police and emergency response service at LAX.

#### 4.15.2 DISCUSSION (III AND IV)

The proposed Project would renovate and reconstruct portion of an existing terminal facility at LAX. Construction and operation of the proposed Project would not induce population growth in the area that would require new schools or parks, nor would construction or operation of the Proposed Project impact service rates or availability of schools or parks.

#### 4.16 RECREATION

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?				Х
b)	Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?				Х

#### 4.16.1 DISCUSSION

The Proposed Project does not include development of recreational facilities nor would it provide improved access to existing public recreation areas. Further, the Terminal 4 Modernization Project would not cause any increase in the use of existing neighborhood and regional parks or other recreational facilities or require the construction or expansion of recreational facilities. Thus, the Proposed Project would have no impact on recreation.

<sup>68</sup> National Fire Protection Association, NFPA 415 Standard on Airport Terminal Buildings, Fueling Ramp Drainage, and Loading Walkways, 2016.

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#### 4.17 TRANSPORTATION

WO	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?				Х
b)	Would the project conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?			Х	
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?				Х
d)	Result in inadequate emergency access?				Х

#### 4.17.1 DISCUSSION (A)

Construction associated with the Proposed Project would generate traffic associated with workers traveling to and from the construction employee parking areas and staging areas, truck haul/delivery trips, and miscellaneous construction-related travel. Delivery of materials would be scheduled to reduce disruptions to the local surface transportation network. No closures of roadways within the local surface transportation network, transit stops, or bicycle and pedestrian facilities are proposed during construction. Peak construction traffic would result in approximately 428 daily construction trips on the local surface transportation network, approximately 78 of which would occur during the a.m. or p.m. commuter peak period. Further, surface network intersections that are included in the construction haul and delivery routing currently perform at level of service B or better. Due to the temporary nature of increased traffic associated with the Proposed Project and the relatively low number of trips added to the local transportation system as a result of construction and construction worker traffic, a vehicle miles traveled (VMT) analysis was not performed for the Proposed Project. Additionally, significant impacts associated with an increase in VMT are generally associated with land use-specific trips generated following construction. Projects that do not increase the number of trips or would be constructed within one-half mile of a major transit stop should be presumed to result in a less than significant impact per Section 15064.3 of the CEQA Statute and Guidelines. The Proposed Project would not increase the Airport's operational capacity as the proposed improvements would replace an existing terminal building with an updated structure of similar scale and the same capacity. The Proposed Project would not conflict with, or otherwise have an impact on, any local transit, transportation, bicycle, or pedestrian plan or ordinance.

The Proposed Project would comply with LAWA's Design and Construction Handbook, which requires construction site logistics plans be developed to identify construction staging areas, employee parking lots, haul routes, and scheduling. Additionally, the Proposed Project would comply with LAX Master Plan commitments to establish construction worker commute and shift times that avoid contributing to peak period traffic and moderate haul- and delivery-related traffic. The Proposed Project would not increase operational traffic at the Airport or on local surface roads and would otherwise comply with local transportation plans and policies; therefore, the Proposed Project would have no impact.

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#### 4.17.2 DISCUSSION (B)

On December 28, 2018, the California Natural Resources Agency, the Office of Planning and Research (OPR), and the Office of Administrative law approved amendments to the CEQA Guidelines, including the Initial Study Checklist. These revisions were based in part to Senate Bill 743 [2013], which stated in part "Upon certification of the guidelines by the Secretary of the Natural Resources Agency pursuant to this section, automobile delay, as described solely by level of service or similar measures of vehicular capacity or traffic congestion shall not be considered a significant impact on the environment pursuant to this division..." In response to this directive, changes were made to the CEQA Guidelines Appendix G impact checklist questions. Given the recent changes in CEQA and absence of an increase in operational traffic negates the need for LADOT or Los Angeles County project-specific traffic analysis; however, for planning purposes LAWA prepared a construction traffic study for the proposed projects (see Attachment 2).

The Proposed Project would not result in an increase in the number of passengers at LAX and would be constructed at the existing CTA, served by the existing surface transportation network. Therefore, no operational increase in VMT would be attributable to the Proposed Project.

Subsequent to the approval of the LAX Master Plan, LAWA established the Coordination and Logistics Management (CALM) team. Working in cooperation with LAWA staff including Terminal Operations, Airport Police, Capital Programming & Planning Group, and Commercial Development Group, the CALM team monitors construction traffic, coordinates land and roadway closures and analyzes traffic conditions it determine the need for additional traffic controls, lane restriping, and traffic signal modifications. This also includes preparation of traffic control plans for both vehicular and pedestrian related transportation. Per LAWA Design and Construction Handbook requirements, the Proposed Project would require construction worker shifts to begin and end in off-peak hours to avoid contributing to local a.m. and p.m. peak hour traffic levels. Additionally, construction contractors would be required to coordinate haul and delivery trips and route construction traffic in a manner that reduces contributions to the local surface transportation network and avoids residential streets and other sensitive receptors to the extent feasible. The avoidance and minimization measures required by LAWA were included in the assumptions for the traffic and transportation analysis associated with the Proposed Project.

The Proposed Project would not substantially increase the number of trips to or from the Airport or increase traffic volume on local roads. Based on the Southern California Association of Governments Transit Priority Area 2045 Map, the Proposed Project and the associated construction materials staging areas are within one half-mile of major transit stops.<sup>69</sup> Per Section 15064.3 of the State CEQA Statute and Guidelines, projects within one-half mile of an existing transit stop should be presumed to cause a less than significant transportation impact. Construction workers are expected to be hired from local labor pools and would not induce growth in the area that would result in an increase in VMT due to construction. Construction activity associated with the Proposed Project would not require road closures or otherwise reroute local traffic in a manner that would result in an increase in VMT. The Proposed Project would have a temporary and less than significant impact on traffic with regard to traffic levels on local roads and intersections and vehicle miles traveled.

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<sup>&</sup>lt;sup>69</sup> Southern California Association of Governments. SCAB GIS Open Data Portal Available: http://gisdata-scag.opendata.arcgis.com/. Accessed October 16, 2019.

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#### 4.17.3 DISCUSSION (C AND D)

The Proposed Project would not include the modification of any existing on-airport roadways, parking systems, remote parking facilities, transit systems, or pedestrian and bicyclist activities, nor would it modify off-airport transportation operations. The improved T4 Concourse would operate in the same location, and in the same manner, as the existing T4 Concourse and would, therefore, not increase hazards due to a geometric design feature. The Proposed Project would be constructed at the existing T4 Concourse and associated apron area. During construction, emergency access routes to and from the Proposed Project site would remain open per FAA Advisory Circular (AC) No. 150/370-10H, State Fire Code Part II – *General Safety Provisions*, and Chapter 33, *Fire Safety During Construction and Demolition*, of Los Angeles City Fire Code regulations. Following construction of the Proposed Project, operation of T4 would generally be consistent with existing conditions. No road closures would be required as a part of the Proposed Project and, therefore, emergency access to T4 and the larger CTA would remain as it currently exists. The Proposed Project would have no impact with regard to creating a hazard to traffic or transportation or availability of emergency access.

#### 4.18 TRIBAL CULTURAL RESOURCES

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
cultu eithe defir	se a substantial adverse change in the significance of a tribal ural resource, defined in Public Resources Code Section 21074 as er a site, feature, place, cultural landscape that is geographically ned in terms of the size and scope of the landscape, sacred place, bject with cultural value to a California Native American tribe, and is:				
a)	Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code Section 5020.1(k).				Х
b)	A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.			X	

#### 4.18.1 DISCUSSION

There is no record or evidence of unique archaeological resources or known tribal cultural resources being located at or near the Proposed Project site. In compliance with AB 52, LAWA has coordinated with all Native American tribes that have notified the Native American Heritage Commission they have a tribal interest in the vicinity of LAX. The San Gabriel Band of Mission Indians is the only Native American tribe that has requested LAWA notify them of regarding planned and potential Airport improvement projects. LAWA has notified the San Gabriel Band of Mission

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Indians of the proposed T4 Modernization Project, in accordance with the consultation request from the tribe, and has completed tribal consultation obligations specified in AB 52.70

Given that the existing Proposed Project site is fully developed with structures and impervious surfaces, and the absence of cultural and archeological resources within or near the Proposed Project site, the Proposed Project is unlikely to affect tribal cultural resources. As discussed in Section 4.5.2 above, LAWA has developed and adopted plans, policies, and procedures that address potential impacts to archaeological resources, which are documented in LAWA's ATP. These plans, policies, and procedures include notification of the Native Heritage Commission (NAHC) and retention of a Native American monitor if/as recommended by NAHC if a unique Native American archaeological resource, Tribal Cultural Resource, or human remains are encountered during construction. LAWA requires all construction projects at LAX to comply with the ATP and will apply this requirement to the Proposed Project. The likelihood for encounter any such resources is low, and these existing measures would ensure that if any unanticipated resources are encountered, impacts would remain less than significant.

### 4.19 UTILITIES/SERVICE SYSTEMS

WO	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Require or result in the relocation or construction of new or expanded water, wastewater treatment or stormwater drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?			Х	
b)	Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years?				Х
c)	Result in a determination by the wastewater treatment provider that would serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?				Х
d)	Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?			Х	
e)	Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?			Х	

#### 4.19.1 DISCUSSION (A)

The existing T4 facility is antiquated and would be partially demolished and reconstructed in place to continue service as an Airport terminal. Certain utility components connected to T4 would be replaced with modern

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<sup>&</sup>lt;sup>70</sup> LAWA submitted a letter to the San Gabriel Band of Mission Indians on October 8, 2019 as notification of the Proposed Project, in response to a standing request that the tribe be informed of excavation activities at LAX and to serve and as an opportunity for tribal monitoring coordination to occur prior to ground disturbing activities associated with the proposed Project. LAWA followed up with the tribe on November 20, 2019, but received no response.

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equivalents. Standby power utility infrastructure would be installed to support air carrier emergency operations, meet LAWA Design and Construction Handbook requirements, and support life safety systems.

Upgrades to the fire and domestic water system will ensure adequate capacity and flow rates to ensure the system is able to serve the facility. Improvements will include connecting the fire water loop at T4 to upgraded fire water loops in the Central Terminal Area (CTA). Upgrades to the storm drain system will include modifications to the slopes surrounding the T4 Concourse and relocation and replacement of inlets to meet current National Fire Protection Association 415<sup>71</sup> requirements. New service connections from T4 will be constructed to connect to the existing sanitary sewer system and oil/water separators will be installed. Modifications to the natural gas system will be made to correspond to the new configuration and size of building components. However, the physical construction activities associated with these new utilities have been accounted for as part of the proposed project in the individual resource sections of this Initial Study. Impacts would be less than significant

#### 4.19.2 DISCUSSION (B-D)

The Proposed Project would not result in an increase in passengers or significant change in number of employees at LAX. Therefore, no significant increase in the immediate or future demand for potable water, wastewater treatment service, or solid waste would occur during operation of T4. A minimum of 75 percent of solid waste created during construction of the Proposed Project would be collected and diverted, in accordance with the LAX Sustainable Design & Construction Requirements document. Materials used in the construction of the Proposed Project would also comply with the LAX Sustainable Design & Construction Requirements, including a minimum amount of local and recycled materials. Design and construction phases would implement strategies to increase energy efficiency, actively and passively, and to reduce waste. The Proposed Project would also be subject to Los Angeles Green Building Code Tier 1 conformance requirements, the City's Low Impact Development Ordinance, and any requirements the design team uses to achieve LEED® Silver certification.

The Airport and T4 tenant businesses would also continue to participate in the LAWA Recycling program. The Countywide (Los Angeles) Integrated Waste Management Plan 2017 Annual Report verified Los Angeles County has approximately 15 years of landfill capacity at existing landfill facilities. Given the high diversion rate of construction and operational solid waste diversion, the Proposed Project would have a less than significant impact on the local solid waste disposal capacity and, in compliance with LAX sustainability goals, would meet local and state solid waste reduction, recycling, and diversion statutes and regulations. The proposed improvements would likely reduce demand on utilities and public service systems at the Airport, as identified in Section 4.6. The Proposed Project would not result in an increase in passengers or aircraft operations that would, in turn, increase the production of solid waste at T4. Therefore, the Proposed Project would have a less than significant impact on utilities and service systems.

#### 4.20 WILDFIRE

wo	ULD THE PROJECT:	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	NO IMPACT
a)	Substantially impair an adopted emergency response plan or emergency evacuation plan?		Х

<sup>&</sup>lt;sup>71</sup> National Fire Protection Association, NFPA 415 Standard on Airport Terminal Buildings, Fueling Ramp Drainage, and Loading Walkways, 2016.

<sup>&</sup>lt;sup>72</sup> Los Angeles World Airports. Los Angeles International Airport Sustainable Design & Construction Requirements. August 4, 2017.

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

#### 4.20.1 DISCUSSION

The Proposed Project would be constructed on previously developed Airport property, within which the risk of wildfire is extremely limited due to absence of unpaved surfaces. The Proposed Project site is not within or near a state responsibility area or lands classified as Tier 2 – Elevated or Tier 3 – Extreme Hazard Zone per the California Public Utilities Commission Fire Map. Neither construction nor operation of the Proposed Project would substantially impair an adopted emergency response plan or emergency evacuation plan. The Proposed Project would have no impact on wildfires or the risks associated with wildfires.

#### 4.21 MANDATORY FINDINGS OF SIGNIFICANCE

wo	ULD THE PROJECT:	POTENTIALLY SIGNIFICANT IMPACT	LESS THAN SIGNIFICANT IMPACT WITH MITIGATION	LESS THAN SIGNIFICANT IMPACT	NO IMPACT
a)	Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?			X	
b)	Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)			X	
c)	Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?			Х	

#### 4.21.1 DISCUSSION – (A)

The proposed Terminal 4 Modernization Project would comprise the partial demolition and reconstruction of an existing airport terminal facility at LAX. The proposed improvements would occur on previously developed Airport property. No sensitive species or habitat exist within or in proximity to the Proposed Project site. Construction of the Proposed Project would result in impact to the environment; however, those impacts have been determined to be temporary and less than significant and would not affect any fish, wildlife, or native plant species. Operation of the Proposed Project would constitute a continuation of existing uses at the T4 Concourse and, therefore, result in a less than significant impact to the environment. The Proposed Project would be constructed in the same location

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as the existing T4 Concourse, which is devoid of any cultural, archaeological, or historic resources. Operation of the Proposed Project may result in a reduction on emissions and other pollutants and more efficient use of resources at T4. The Proposed Project would help LAWA and the greater Los Angeles Metropolitan Area achieve short term environmental goals; however, those goals would not be achieved to the detriment of long-term environmental goals of the Airport or the region. Long-Term environmental goals would also be achieved through reduction of emissions and reduced demand on resources at T4. Therefore, the Proposed Project would not impact any site associated with notable historic or prehistoric events or cultures.

#### 4.21.2 DISCUSSION - (B)

Implementation of the Proposed Project would largely be restricted to the T4 Concourse. The majority of T4 gates would remain open throughout construction to reduce operational impacts on other boarding areas and maintain a minimum level of service for passengers. All impacts that could occur as a result of the Proposed Project were determined to be less than significant. BMPs and avoidance and minimization measures would be implemented to reduce the potential for cumulatively significant impacts to occur as a result of the Proposed Project in combination with other existing and future on-and off-Airport construction projects.

Construction of Terminal 6 (T6) improvements are proposed to occur from mid-2020 to mid-2023. Temporary gate closures would also occur at T6; however, a maximum of 3 gates are expected to be closed in any phase of the T6 project. The Airport is expected to accommodate T6 gate closures through use of ground-loading adjacent to T6 and, if necessary, bussing to the MSC or other remote gates. Due to the limited number of gates expected to be closed to accommodate construction associated with the T6 improvements, the overlap in construction with the Proposed Project is not expected to result in remote gate demand beyond the Airport's capacity. Additionally, the Proposed Project construction and the T6 improvements would be subject to coordination by the Airport's CALM Team, which monitors development projects at LAX to avoid conflicts between ongoing airport operations and construction activities.

Due to the limited nature of the impacts the Proposed Project may have on the environment, the methods by which the Project would be constructed and operated, and the location of the Proposed Project, the Proposed Project, when considered cumulatively with other on- and off-Airport construction projects, would result in a less than significant impact to the environment.

#### 4.21.3 DISCUSSION – (C)

Implementation of the proposed T4 Modernization project would necessarily comply with federal, state, and local regulations to ensure construction and operation of the Proposed Project would not significantly impact human health and safety. Analysis determined that all potential impacts associated with the Proposed Project would be less than significant with implementation of the BMPs and avoidance and minimization measures detailed in the Initial Study.

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# **ATTACHMENT 1**

# Air Quality Analysis

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## AIR QUALITY ANALYSIS

#### A.1 INTRODUCTION

This appendix summarizes the methods used to estimate emissions of carbon monoxide (CO), volatile organic compounds (VOCs), oxides of nitrogen (NO<sub>x</sub>), oxides of sulfur (SO<sub>x</sub>), particulate matter less than ten microns in diameter (PM<sub>10</sub>), particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>), and greenhouse gases (GHGs)<sup>1</sup> in support of the Initial Study for the modernization of Terminal 4 (the Proposed Project) at Los Angeles International Airport (the Airport). The construction emissions analysis was conducted to develop emissions inventories pursuant to the California Environmental Quality Act (CEQA). In addition, the analysis was conducted to determine whether emissions associated with construction activities would exceed applicable thresholds of significance identified by the South Coast Air Quality Management District (SCAQMD).

Construction of the Proposed Project would begin in the third Quarter (Q3) of calendar year 2021 and be completed by Q4 2026. Therefore, pollutant emissions were estimated for the following construction years: 2021, 2022, 2023, 2024, 2025, and 2026.

#### A.2 REGULATORY SETTING

Under the federal Clean Air Act (CAA), as amended, the USEPA has developed National Ambient Air Quality Standards (NAAQS) for the following air pollutants, referred to as criteria air pollutants: CO, nitrogen dioxide (NO<sub>2</sub>), ozone (O<sub>3</sub>), sulfur dioxide (SO<sub>2</sub>), lead (Pb), PM<sub>10</sub>, and PM<sub>2.5</sub>. The CAA defines the need to establish two standards: primary standards, which define maximum concentrations of criteria air pollutants to protect public health, and secondary standards, which define maximum concentrations of criteria air pollutants to protect public welfare.

Individual states are required to identify general geographic areas where the NAAQS for these criteria air pollutants are not met. The USEPA designates such areas as nonattainment areas and qualifies the nonattainment status by severity of nonattainment ranging from marginal to moderate to serious to extreme nonattainment. Areas that were in nonattainment but have since attained the NAAQS are considered to be an attainment/maintenance area for several years before being designated as being in attainment. A state with a nonattainment or maintenance area must prepare a State Implementation Plan (SIP) that describes the programs and requirements that the state will implement to attain or maintain the NAAQS by the deadlines specified in the CAA, as well as subsequent related documents promulgated by the USEPA.

The California Air Resources Board (CARB) monitors air quality conditions throughout the state and enforces state air regulations, issues permits, and formulates and maintains SIPs. Under the California Clean Air Act, patterned after the federal CAA, areas are designated as attainment or nonattainment for California Ambient Air Quality Standards (CAAQS).

<sup>&</sup>lt;sup>1</sup> Emissions of GHGs are quantified in terms of carbon dioxide (CO<sub>2</sub>) equivalent (CO<sub>2e</sub>). CO<sub>2e</sub> represents all CO<sub>2</sub> emissions plus methane (CH<sub>4</sub>) and nitrous oxide (N<sub>2</sub>O) as adjusted by their corresponding Global Warming Potential (GWP) weighted value. The GWP values are based on the 2007 Intergovernmental Panel on Climate Change (IPCC) Fourth Assessment Report (available at https://www.ipcc.ch/pdf/assessment-report/ar4/syr/ar4\_syr\_full\_report.pdf) and are consistent with the 2014 California Air Resources Board (CARB) Scoping Plan Update (available at https://www.arb.ca.gov/cc/scopingplan/document/updatedscopingplan2013.htm).

At the local level, the South Coast Air Quality Management District (SCAQMD) is responsible for ensuring that federal and state air quality standards are met by monitoring ambient air pollutant levels throughout Los Angeles County and the South Coast Air Basin. The SCAQMD implements strategies to ensure SIP regulations are maintained and issues air quality permits for stationary equipment.

For the NAAQS, Los Angeles County (South Coast Air Basin) is in attainment for NO2, SO2, CO (maintenance), and PM<sub>10</sub> (maintenance); extreme nonattainment for O<sub>3</sub>; and serious nonattainment for PM<sub>2.5</sub>.<sup>2</sup> For the CAAQS, the South Coast Air Basin is designated as a nonattainment area for O<sub>3</sub>, PM<sub>10</sub>, and PM<sub>2.5</sub>, and attainment for CO, NO<sub>2</sub>, and SO<sub>2</sub>.<sup>3</sup>

#### **A.3 METHODOLOGY**

The California Emissions Estimator Model (CalEEMod), version 2016.3.2 was used to estimate the construction emissions associated with the Proposed Project. CalEEMod was originally developed for the California Air Pollution Officers Association in collaboration with the South Coast Air Quality Management District (SCAQMD) as a modeling tool to assist local public agencies with estimating air quality impacts from land use projects. The model estimates construction, area source, and operational emissions from a wide variety of land use development projects, such as residential neighborhoods, shopping centers, office buildings, etc. The model also identifies mitigation measures and associated emission reductions. CalEEMod calculates emissions for CO, reactive organic gases (ROG), 4 NOx, sulfur dioxide (SO<sub>2</sub>),<sup>5</sup> PM<sub>10</sub>, PM<sub>2.5</sub>, carbon dioxide (CO<sub>2</sub>), methane (CH<sub>4</sub>), and nitrous oxide (N<sub>2</sub>O) for both on-road and off-road construction sources. The model uses the California Air Resources Board's (CARB) EMFAC2014 model for on-road vehicle emissions and the CARB's OFFROAD2011 model for off-road vehicle emissions.

The EMFAC2014 model calculates emission rates from all motor vehicles, ranging from passenger cars to heavyduty trucks, operating on highways, freeways, and local roads in California. In CalEEMod, default or user-defined vehicle activity data is used to derive total vehicle miles traveled (VMT), which is multiplied by appropriate EMFAC2014 emission factors to calculate on-road emissions. EMFAC2014 emission factors are region/county specific. For purposes of this analysis, emission factors specific to the Los Angeles-South Coast County area were selected in CalEEMod. All emission factors account for emissions from start, running, and idling exhaust. In addition, ROG (VOC) emission factors include running loss emissions, while the PM<sub>10</sub> and PM<sub>2.5</sub> emission factors include tire and brake wear. CalEEMod also calculates on-road fugitive dust associated with paved and unpaved roads. Default values for parameters required by CalEEMod to calculate fugitive dust from on-road vehicles are based on recommendations in USEPA AP-42.

To estimate off-road construction equipment-related exhaust emissions, CalEEMod uses the OFFROAD2011 model to generate emission factors for construction equipment, which are based on an average fleet mix that accounts for the turnover rate and average emissions for specific types of construction equipment. Depending on the construction phase, CalEEMod generates default values for number and types of construction equipment, horsepower, load factor, and daily operating hours. The model allows the user to override these values as

| 2 |

<sup>&</sup>lt;sup>2</sup> US Environmental Protection Agency, Green Book, California Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants, https://www3.epa.gov/airquality/greenbook/anayo\_ca.html (accessed September 12, 2019).

http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf (accessed September 12, 2019).

<sup>&</sup>lt;sup>4</sup> For purposes of this analysis, it was assumed that estimates of VOC emissions are equal to calculated emissions of ROG.

<sup>&</sup>lt;sup>5</sup> For purposes of this analysis, it was assumed that estimates of SO<sub>x</sub> emissions are equal to calculated emissions of SO<sub>2</sub>.

appropriate, although default values are used for purposes of this analysis. For each piece of equipment selected, CalEEMod generates an emissions estimate using the following equation:

> Equipment Emissions (pounds/day) = # of pieces of equipment \* grams per brake horsepower-hour \* equipment horsepower \* hours/day \* load factor

In association with off-road construction equipment, CalEEMod calculates fugitive dust (PM<sub>10</sub> and PM<sub>2.5</sub>) emissions from material movement, including haul road grading, earth bulldozing, and truck loading. Fugitive dust emissions from material movement are calculated using the methodology described in USEPA AP-42.

Information used in developing CalEEMod inputs for this analysis was obtained from the description of the Proposed Project included in the Initial Study documentation, as well as from the Terminal 4/5 Project Definition Book.<sup>6</sup>

For purposes of this analysis, the evaluation of significance involves identifying if the action would cause pollutant concentrations to exceed one or more of the CAAQS, as established by the SCAQMD under the California Clean Air Act, for any of the time periods analyzed, or to increase the frequency or severity of any such violations.

To evaluate whether construction of the Terminal 4 Modernization Project would result in exceedance of the thresholds of significance, the emissions associated with construction activities were evaluated for conformity with the applicable SIPs. If the project would cause an exceedance of thresholds of significance, then the lead agency would need to make a determination that the project would result in a significant environmental impact. Additionally, if a project would otherwise conflict with implementation of the SIP, expose sensitive receptors to substantial pollutant concentrations, or create objectionable odors affecting a substantial number of people, the project would also result in a significant environmental impact. If project emissions would not exceed the thresholds of significance or otherwise violate air quality guidelines, no further analysis or documentation is required. For purposes of CEQA, the evaluation of significance involves the comparison of estimated construction emissions against SCAQMD mass daily emissions thresholds. For construction activities, these thresholds are as follows:

CO: 550 pounds/day

VOC: 75 pounds/day

NOx: 100 pounds/day

SO<sub>x</sub>: 150 pounds/day

PM<sub>10</sub>: 150 pounds/day

PM<sub>2.5</sub>: 55 pounds/day

#### **ASSUMPTIONS** A.4

#### A.4.1 CONSTRUCTION ACTIVITIES

Construction of the Proposed Project would result in short-term changes in air emissions from sources such as: exhaust emissions from off-road construction equipment, haul trucks, and construction worker vehicles; fugitive VOC emissions from paving; and fugitive dust emissions from grading, materials handling, and vehicles traveling on

American Airlines, Terminal 4/5 Project Definition Book (PDB), June 14, 2019.

paved and unpaved roads. Implementation of the Proposed Project is anticipated to occur in three phases, each of which was evaluated separately in CalEEMod.

- **Phase 1:** Phase 1 includes demolition of the existing Satellite Extension, construction of the southernmost portion of the proposed Terminal 4 Concourse replacement structure, as well as reconstruction of the adjacent (south) apron area and associated aircraft parking positions.
- Phase 2: Phase 2 includes renovation and expansion of the west side of the existing Satellite and Terminal 4 Connector building, interior renovations to the West Ticketing Building portion of the Terminal 4 Headhouse, and reconstruction of the adjacent (west) apron area and associated aircraft parking positions.
- Phase 3: Phase 3 includes renovation of the east sides of the existing Satellite and Terminal Connector buildings, continued interior renovation of the West Ticketing Building portion of the Terminal 4 Headhouse, and reconstruction of the adjacent (east) apron area and associated aircraft parking positions.

CalEEMod is capable of estimating emissions for several types of construction activities, with each activity containing one or more modeling elements, such as fugitive dust, off-road construction equipment exhaust, on-road vehicle exhaust, and off-gassing. Each activity is assumed to generate emissions throughout the entire activity duration. For air quality modeling purposes, each phase of the Proposed Project was assumed to include the following construction activities which were modeled in CalEEMod.

- Building Demolition: Removal of existing building structures, including the hauling of demolished material from the construction site.
- Building Construction: Construction of terminal/concourse structures. In each phase, the construction of cement foundations totaling 1,000 linear feet by 10 feet wide by 10 feet deep was assumed. For purposes of this analysis, building renovation activities are combined with building rebuild and new construction with regards to the assignment of construction days and equipment type, number, and operating hours. This is a conservative assumption, since building renovation would typically not be expected to require the same level of construction effort or use of heavy equipment compared to new construction from the foundation up.
- Architectural Coating: Evaporative emissions were assumed to result from the application of interior and exterior paint applied to new or renovated building areas. In each phase, paint was assumed to be applied to the entire building area (square footage). The emission factors used by CalEEMod are based on a VOC content of 50 grams per liter of paint and an application rate of 180 square feet per gallon.
- Apron Demolition: Removal and crushing of existing apron pavement, including the hauling of demolished material from the construction site.
- **Grading:** Subsequent to removal of existing apron pavement, grading of the entire area to be reconstructed was assumed. However, no import or export of additional or excess soil was assumed.
- Apron Construction: Apron reconstruction was assumed to involve phased demolition/removal of the entire existing Terminal 4 apron area pavement, followed by installation of new base material and new concrete apron pavement. To the extent that some existing pavement sections may be preserved, this represents a conservative assumption for purposes of this analysis. Apron construction was assumed to include the hauling of base material and concrete to the site.

Areas (square footages) of various building and apron components are described and summarized in the Project Description. For purposes of the air quality analysis, these building and apron areas were attributed to each of the three phases, as presented in **Table 1** and **Table 2**, respectively. CalEEMod uses the size (area) of a project or project

component to assign default parameters such as construction duration (days), as well as the number, type, and operating hours of construction equipment.

TABLE 1 PROPOSED PROJECT BUILDING AREAS

PROJECT COMPONENT BY PHASE	AREA (SQUARE FEET)
Phase 1	
Demolition of Satellite Extension	100,290
Satellite Extension rebuild	100,290
Phase 2	
West Ticketing and Connector Building renovation	102,135
Satellite Building demolition	25,073
Satellite Building rebuild	25,073
Connector and Satellite Building new construction	135,603
Phase 3	
West Ticketing and Connector Building renovation	102,135
Satellite Building demolition	25,073
Satellite Building rebuild	25,073
Connector and Satellite Building new construction	135,603
Totals	
Building demolition	150,435
Building renovation	204,270
Building rebuild and new construction	421,640

SOURCE: Ricondo & Associates, Inc., September 2019, based on information provided by Pierce Goodwin Alexander & Linville, Inc. and American Airlines, *Terminal 4/5 Project Definition Book* (PDB), June 14, 2019.

TABLE 2 PROPOSED PROJECT APRON AREAS

APRON PAVEMENT DEMOLITION	TOTAL AREA (SQUARE FEET)	CONCRETE (CUBIC YARDS)	ASPHALT (CUBIC YARDS)	TOTAL PAVEMENT (CUBIC YARDS)
Phase 1	196,928	7,088	2,029	9,117
Phase 2	180,682	6,503	1,861	8,365
Phase 3	121,406	4,370	1,251	5,621
Total	499,017	17,961	5,141	23,102

NEW APRON PAVEMENT	TOTAL AREA (SQUARE FEET)	CONCRETE (CUBIC YARDS)	BASE MATERIAL (CUBIC YARDS)	SUBBASE MATERIAL (CUBIC YARDS)
Phase 1	173,161	10,536	2,336	3,848
Phase 2	158,876	9,667	2,143	3,531
Phase 3	106,754	6,495	1,440	2,372
Total	438,790	26,698	5,918	9,751

SOURCE: Ricondo & Associates, Inc., September 2019, based on information provided by Pierce Goodwin Alexander & Linville, Inc. and American Airlines, *Terminal* 4/5 Project Definition Book (PDB), June 14, 2019.

#### A.4.2 CONSTRUCTION SCHEDULE

**Table 3** presents the assumed construction schedule in terms of number of workdays per year (assuming a five-day workweek) for each phase and construction activity, as modeled in CalEEMod. Phase 1 is anticipated to begin in Q3 2021 and be completed by Q1 2023. Phase 2 is anticipated to begin in Q3 2023 and be completed by Q2 2025. Phase 3 is anticipated to begin in Q3 2025 and be completed by Q4 2026.

#### A.4.3 CONSTRUCTION EQUIPMENT

For each construction activity, default construction equipment types, amounts and usage hours were assumed, as assigned by CalEEMod. Default equipment usage hours are estimated in CalEEMod based on the overall size of the project. **Table 4** presents a summary of equipment types, specifications, and usage for each construction phase and activity.

Onroad construction vehicle trips include construction worker vehicle trips to and from the job site, off site hauling trips, and material delivery trips. The number of roundtrips per year for each type of onroad activity was calculated within CalEEMod based on project dimensions and required quantities of various construction materials. Default roundtrip distances were assumed. Vehicle miles traveled for each onroad activity was calculated by multiplying the total number of vehicle trips by the trip distance. **Table 5** summarizes the onroad activity for the Proposed Project.

TABLE 3 ESTIMATED SCHEDULE BY CONSTRUCTION PHASE

				WORKDAYS <sup>1</sup>			
ACTIVITY BY PHASE	2021	2022	2023	2024	2025	2026	TOTAL
Phase 1							'
Building Demolition	66	14					80
Building Construction		220					220
Architectural Coating		10					10
Apron Demolition		16	4				20
Grading			8				8
Apron Construction			30				30
Phase 2							
Building Demolition							20
Building Construction			45	185			230
Architectural Coating				20			20
Apron Demolition				20			20
Grading				8			8
Apron Construction				29	1		30
Phase 3							
Building Demolition					20	0	20
Building Construction					46	184	230
Architectural Coating						20	20
Apron Demolition						20	20
Grading						6	6
Apron Construction						20	20

#### NOTE:

SOURCE: Ricondo & Associates, Inc., September 2019, based on information provided by Pierce Goodwin Alexander & Linville, Inc. and default calculations performed within the California Emissions Estimator Model version 2016.3.2.

<sup>1</sup> Assumes 5 working days per week. Workdays were based on construction start and end dates that were assumed for emissions modeling purposes only. The general timeframe for project completion, along with specific construction start and end dates are subject to environmental clearance, permitting, contractor procurement, and other factors.

TABLE 4 OFF-ROAD CONSTRUCTION EQUIPMENT ACTIVITY

			PHASE 1		PI	HASE 2	Ph	HASE 3
EQUIPMENT TYPE	HORSE- POWER	LOAD FACTOR	UNIT AMOUNT	USAGE (HOURS/DAY)	UNIT AMOUNT	USAGE (HOURS/DAY)	UNIT AMOUNT	USAGE (HOURS/DAY)
Building Demolition		-				•		
Equipment								
Excavators	158	0.38			3	8	3	8
Rubber Tired Dozers	247	0.40	1	8	2	8	2	8
Concrete/Industrial Saws	81	0.73	1	8	1	8	1	8
Tractors/Loaders/Backhoes	97	0.37	3	8				
Building Construction								
Cranes	231	0.29	1	8	1	7	1	7
Forklifts	89	0.20	2	7	3	8	3	8
Tractors/Loaders/Backhoes	97	0.37	1	6	3	7	3	7
Welders	46	0.45	3	8	1	8	1	8
Generator Sets	84	0.74	1	8	1	8	1	8
Cement and Mortar Mixers	9	0.56	2	6	2	6	2	6
Architectural Coating								
Air Compressor	78	0.48	1	6	1	6	1	6
Apron Demolition								
Excavators	158	0.38			3	8	3	8
Rubber Tired Dozers	247	0.40	1	8	2	8	2	8
Concrete/Industrial Saws	81	0.73	1	8	1	8	1	8
Tractors/Loaders/Backhoes	97	0.37	3	8		8		8
Crushing/Proc. Equipment	85	0.78	1	8	1	8	1	8
Grading								
Rubber Tired Dozers	247	0.40	1	8	1	8	1	8
Tractors/Loaders/Backhoes	97	0.37	2	7	3	8	3	8
Graders	187	0.41	1	8	1	8	1	8
Apron Construction								
Pavers	130	0.42	1	8	1	8	1	8
Cement and Mortar Mixers	9	0.56	1	8	1	8	1	8
Rollers	80	0.38	2	8	2	8	2	8
Tractors/Loaders/Backhoes	97	0.37	1	8	1	8	1	8
Paving Equipment	132	0.36	1	8	1	8	1	8

SOURCE: Ricondo & Associates, Inc., September 2019, based on information provided by Pierce Goodwin Alexander & Linville, Inc. and default calculations performed within the California Emissions Estimator Model version 2016.3.2.

TABLE 5 ON-ROAD CONSTRUCTION VEHICLE ACTIVITY

	CONSTRUCTION	I WORKER TRIPS	VENDOR VE	HICLE TRIPS	HAULING TRIPS		
ACTIVITY BY PHASE	ROUNDTRIPS	TRIP LENGTH (MILES)	ROUNDTRIPS	TRIP LENGTH (MILES)	ROUNDTRIPS	TRIP LENGTH (MILES)	
Phase 1	'					1	
Building Demolition	1,040	14.7			461	20	
Building Construction	7,040	14.7	3,520	6.9	463	20	
Architectural Coating	60	14.7					
Apron Demolition	300	14.7			1,823	20	
Grading	80	14.7			0	20	
Apron Construction	450	14.7			2,090	20	
Phase 2							
Building Demolition	300	14.7			115	20	
Building Construction	19,320	14.7	9,890	6.9	463	20	
Architectural Coating	340	14.7					
Apron Demolition	360	14.7			1,673	20	
Grading	104	14.7			0	20	
Apron Construction	450	14.7			1,918	20	
Phase 3							
Building Demolition	300	14.7			115	20	
Building Construction	19,320	14.7	9,890	6.9	463	20	
Architectural Coating	340	14.7					
Apron Demolition	360	14.7			1,124	20	
Grading	78	14.7					
Apron Construction	300	14.7			1,288	20	

SOURCE: Ricondo & Associates, Inc., September 2019, based on information provided by Pierce Goodwin Alexander & Linville, Inc. and default calculations performed within the California Emissions Estimator Model version 2016.3.2.

Assumptions regarding on-road construction vehicles for this project are as follows:

- Worker trips: CalEEMod default values were used for worker trips. CalEEMod generally applies a factor of 1.25 workers per piece of construction equipment in each activity to estimate worker roundtrips. The emissions estimates assume a construction worker commute fleet mix of 50 percent light duty autos and 50 percent light duty trucks. The default value in CalEEMod for worker trip length (14.7 miles) was also used.
- **Vendor trips:** Vendor trips include deliveries of miscellaneous construction materials and other deliveries associated with building construction activities. Default values for the number of trips are based on the size of the building. Default values in CalEEMod for vendor vehicle type (heavy-duty truck) and trip length (6.9 miles) were also used.
- Hauling trips: For all hauling trips, default assumptions for haul trip vehicle type (heavy-heavy-duty trucks) and travel distance (20 miles) were assumed.

Demolished building material was assumed to be hauled off-site. By default, CalEEMod assumes that 1 square-foot of building area is equal to 10 cubic feet of building volume, 1 cubic-foot of building volume is equal to 0.25 cubic feet of waste volume, and that 1 cubic-yard of building waste equates to 0.5-ton weight. Therefore, the model applies a factor of 0.046 ton of waste material per building square-foot. CalEEMod then calculated the required roundtrips for hauling the material by assuming a haul truck capacity of approximately 20 tons per trip and multiplying by two for a roundtrip. Default hauling trip length (20 miles) was assumed.

Hauling trips related to building construction include the hauling of cement on-site for construction of building foundations. CalEEMod calculates the required roundtrips for hauling the material by assuming 16 cubic yards hauling capacity of a truck (multiplied by two for a roundtrip).

Demolished apron pavement was assumed to be crushed and hauled off-site. The total pavement to be removed by phase is presented in Table 2. The demolished pavement was assumed to weigh two tons per cubic-yard. CalEEMod then calculated the required roundtrips for hauling the material by assuming a haul truck capacity of approximately 20 tons per trip and multiplying by two for a roundtrip.

Construction of new apron areas assumes the need for concrete, base material, and subbase material to be hauled on-site. Quantities of these materials assumed in this analysis are presented in Table 2. The material estimates for concrete and base layers consider the depth of materials needed to accommodate various sizes of aircraft on the Terminal 4 apron, plus a contingency of 20 percent. CaleEMod calculates the required roundtrips for hauling the material by assuming 16 cubic yards hauling capacity of a truck (multiplied by two for a roundtrip).

Fugitive emissions sources were also included in the analysis. Default values for parameters required by CalEEMod to calculate fugitive dust (PM<sub>10</sub> and PM<sub>2.5</sub>) from on-road vehicles are based on recommendations in USEPA AP-42. For off-road construction equipment, CalEEMod calculates fugitive dust emissions from material movement, including grading, earth bulldozing, and truck loading. Fugitive dust emissions from material movement are calculated using the methodology described in USEPA AP-42. As previously noted, the analysis also includes estimates of fugitive (evaporative) VOC emissions resulting from interior and exterior painting activities.

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<sup>&</sup>lt;sup>7</sup> Email from Diana Payne (PGAL) to Jessica Baker (Rivers & Christian), "Terminal 4 Concourse: Environmental Schedule & Additional Data Needs." July 25, 2019.

#### A.5 SUMMARY OF CONSTRUCTION EMISSIONS

**Table 6** presents estimated emissions in pounds per year for comparison against applicable SCAQMD thresholds of significance. Although construction activities overlap in certain years, all construction activities for each phase are assumed to occur consecutively, so the maximum pounds per day levels presented in each year represent the total maximum daily emissions for that year. Daily NO<sub>x</sub> emissions result from the operation of construction equipment and hauling trucks throughout the project. Daily VOC emissions primarily reflect off-gassing from painting activities that are assumed to occur over a span of 10 days in Phase 1, 20 days in Phase 2, and 20 days in Phase 3. As shown, maximum daily emissions for all pollutants are below applicable mass daily thresholds of significance.

TABLE 6 PROPOSED PROJECT CONSTRUCTION EMISSIONS SUMMARY

	EMISSIONS (POUNDS/DAY)						
YEAR BY PHASE	СО	VOC	NOx	SOx	PM <sub>10</sub>	PM <sub>2.5</sub>	CO <sub>2E</sub>
Phase 1					'		
2021	15	2	21	0	3	1	2,976
2022	25	35	43	0	23	5	10,806
2023	23	2	32	0	27	5	10,482
Phase 2							
2023	21	2	22	0	3	1	4,834
2024	29	46	37	0	22	5	11,309
2025	16	1	18	0	26	7	6,953
Phase 3							
2025	20	2	20	0	2	1	4,762
2026	28	46	31	0	11	4	9,053
Maximum Daily Emissions							
2021	15	2	21	0	3	1	2,976
2022	25	35	43	0	23	5	10,806
2023	23	2	32	0	27	5	10,482
2024	29	46	37	0	22	5	11,309
2025	20	2	20	0	26	7	6,953
2026	28	46	31	0	11	4	9,053
Overall Maximum	29	46	43	0	27	7	11,309
Mass Daily Threshold of Significance	550	75	100	150	150	55	
Significant?	No	No	No	No	No	No	

NOTES:

CO = carbon monoxide  $SO_X = oxides of sulfur$ 

VOC = volatile organic compound  $PM_{10}$  = particulate matter less than ten microns in diameter  $NO_X$  = oxides of nitrogen  $PM_{2.5}$  = particulate matter less than 2.5 microns in diameter

CO<sub>2e</sub> = carbon dioxide equivalent (in metric tons per year)

Totals may not sum due to rounding.

SOURCE: Ricondo & Associates, Inc., October 2019, based on information provided by Pierce Goodwin Alexander & Linville, Inc. and default calculations performed within the California Emissions Estimator Model version 2016.3.2.

#### A.6 CALEEMOD DATA

CalEEMod provides a report presenting summary and detail emissions tables, as well as various model inputs/assumptions. This report for each modeling run is provided in the following pages. The modeling runs that were performed in CalEEMod include the following:

- LAX T4 Modernization\_Ph1\_annual: This run includes annual emissions from all construction activities associated with Phase 1.
- LAX T4 Modernization\_Ph1\_daily: This run includes daily emissions from all construction activities associated with Phase 1.
- LAX T4 Modernization\_Ph2\_annual: This run includes annual emissions from all construction activities associated with Phase 2.
- LAX T4 Modernization\_Ph2\_daily: This run includes daily emissions from all construction activities associated with Phase 2.
- LAX T4 Modernization\_Ph3\_annual: This run includes annual emissions from all construction activities associated with Phase 3.
- LAX T4 Modernization\_Ph3\_daily: This run includes daily emissions from all construction activities associated with Phase 3.

# **ATTACHMENT 2**

# Construction Traffic Analysis

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## **CONSTRUCTION TRAFFIC**

Construction associated with the proposed Terminal 4 Modernization Project (Proposed Project) would generate traffic associated with workers traveling to and from the construction employee parking areas and staging areas, truck haul/delivery trips, and miscellaneous construction-related travel. This section qualitatively addresses the anticipated construction traffic impacts specific to the Proposed Project.

This construction traffic analysis builds upon relevant analysis and assumptions from previous LAX EIRs, which were updated as appropriate for the Proposed Project's impact analysis. It was assumed that construction employee parking and material staging associated with the Proposed Project would be located along Westchester Parkway, near the intersection of Westchester Parkway and La Tijera Boulevard. Material delivery to the airfield would be provided via Post 23, located near the Westchester Parkway and Pershing Drive intersection. Additionally, secondary airfield access would be provided via Post 236B located near the intersection of Aviation Boulevard and 111th Street. It was assumed that material delivery from the staging lot to the airfield would occur during off-peak time periods. Additionally, any Terminal 4 curbside material deliveries would occur during off-peak time periods (between the hours of 12:00 a.m. and 6:00 a.m.). The subcontractor shall coordinate with the LAWA Construction and Logistics Management (CALM) team prior to all curbside deliveries.

#### **REGULATORY CONTEXT**

The City of Los Angeles Department of Transportation (LADOT) Transportation Impact Study Guidelines<sup>1</sup> requires that a Traffic Study be prepared if the following operational criteria are met:

- A project is likely to add 500 or more daily operational trips
- A project is likely to add 43 or more a.m. or p.m. peak hour operational trips

In addition, the 2010 Congestion Management Program (CMP) for Los Angeles County<sup>2</sup> provides CMP Guidelines to assist local agencies in evaluating impacts of land use projects on the CMP system through the preparation of a regional transportation impact analysis (TIA). A CMP TIA is necessary for all projects that include, at a minimum, the following operational trips:

- 50 or more trips added to a CMP arterial intersection during either the weekday a.m. or p.m. peak hours
- 150 or more trips added to the mainline freeway monitoring locations during either the weekday a.m. or p.m. peak hours

During the scoping of the South Airfield Improvement Project EIR traffic study in 2004, LADOT indicated that no traffic study was required because there was "no requirement to assess the temporary traffic impacts of a project resulting from construction activities. So, the proposal to prepare a traffic study is voluntary." Additionally, LADOT

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<sup>&</sup>lt;sup>1</sup> City of Los Angeles Department of Transportation, *Transportation Impact Study Guidelines*, December 2016. Available: http://ladot.lacity.org/sites/g/files/wph266/f/COLA-TISGuidelines-010517.pdf.

<sup>&</sup>lt;sup>2</sup> Los Angeles County Metropolitan Transportation Authority, 2010 Congestion Management Program, October 2010.

<sup>&</sup>lt;sup>3</sup> Carranza, Tomas, City of Los Angeles Department of Transportation, email to Pat Tomcheck, Los Angeles World Airports, *Subject: Re: FW: LAX Traffic Methodology Memo*, July 29, 2004.

reiterated in January 2017 that it does not require traffic impact studies for traffic construction-related impacts.<sup>4</sup> However, Los Angeles World Airports (LAWA) has determined that the preparation of a traffic study is still useful in order to provide a full assessment and documentation of the impacts generated by the construction of proposed projects.

The Proposed Project would be subject to LAWA's Design and Construction Handbook, which requires that site logistics plans be prepared and submitted to LAWA for review and approval. The site logistics plan is required to identify points of entrance locations and traffic routes for equipment, trucks, and worker vehicles; construction worker parking; staging/laydown areas; emergency vehicle access; and other information relating to project construction logistics. The Design and Construction Handbook also includes provisions relating to construction work hours and bulk material deliveries.<sup>5</sup> Specifically, the Handbook requires bulk material deliveries (e.g., aggregate, bulk cement) to be scheduled during off-peak hours unless prior written approval is provided by the Coordination and Logistics Management (CALM) Team. In addition, the Handbook specifies that construction work hours should avoid peak commuter traffic periods to the extent possible.

#### STUDY AREA AND BASELINE TRAFFIC CONDITIONS

Consistent with LAX Master Plan Commitment ST-14 (Construction Employee Shift Hours), and described further below, employees are estimated to be on-site prior to the a.m. commuter peak period of 7:00 a.m. to 9:00 a.m. and off-site prior to the p.m. commuter peak period of 4:30 p.m. to 6:30 p.m. Additionally, consistent with LAX Master Plan Commitment ST-22 (Designated Truck Routes), truck deliveries will be on designated routes only (freeways and non-residential streets). Considering the LAX Master Plan Commitments, as well as the location of the material staging area (located near the intersection of Westchester Parkway and La Tijera Boulevard, the traffic study area for the construction traffic analysis includes the following intersections:

- Imperial Highway and Main Street
- Imperial Highway and Pershing Drive
- Pershing Drive and Westchester Parkway

Baseline conditions used in the analysis of project-related construction traffic impacts are defined as 2018 traffic conditions within the traffic study area. Intersection turning movement traffic volume data were collected at several intersections surrounding LAX over a two-year period (2014 to 2015). Due to ongoing construction of the Metro Crenshaw/LAX Transit Corridor project along Aviation Boulevard, traffic counts in the area were not updated as they are not considered representative of typical baseline conditions; therefore, the intersection turning movement counts conducted previously were used as the basis for the construction traffic analysis.

LAWA conducts annual driveway volume counts at various locations throughout the Airport including those adjacent to public parking lots, employee parking lots, cargo facilities, rental car facilities, and off-Airport parking facilities. LAWA also conducts annual traffic volume counts each August along the Central Terminal Area (CTA) roadways to

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<sup>&</sup>lt;sup>4</sup> Ayala, Pedro, City of Los Angeles Department of Transportation, email to Pat Tomcheck, Los Angeles World Airports, *Subject: Re: Traffic Impact Studies for Construction-Related Impacts*, January 19, 2017.

<sup>&</sup>lt;sup>5</sup> City of Los Angeles, Los Angeles World Airports, Los Angeles World Airports Design and Construction Handbook: Design Standards and Guide Specifications, Division I – General Requirements, July 2017. Available: https://www.lawa.org/en/lawa-businesses/lawa-documents-and-guidelines/lawa-design-and-construction-handbook/design-standards-and-guide-specifications.

estimate annual Airport traffic volumes. Considering the location of the study area intersections, it was determined that each intersection contains a mix of both Airport-related traffic and non-Airport-related traffic. Consequently, both the driveway count data and CTA data were used to establish a growth rate to adjust the 2015 traffic volumes to 2018 levels. Using available driveway count data and CTA data through 2017, the a.m. traffic volumes were estimated to be 15.7 percent greater in 2017 when compared to 2015, while the p.m. traffic volumes were estimated to be 15.5 percent greater.<sup>6</sup> It was then assumed that growth would continue at approximately 5.0 percent from 2017 to baseline 2018. This results in an increase of 20.7 percent for the a.m. traffic volumes and 20.5 percent for the p.m. traffic volumes from 2015 to 2018. These volumes were used as the baseline traffic volumes for use in the construction traffic analysis and to assess potential project-related construction traffic impacts. The baseline 2018 volumes and corresponding intersection levels of service (LOS) are shown below in **Table 1**. As shown in the table, each intersection was estimated to operate at LOS C or better under baseline 2018 conditions.

TABLE 1 INTERSECTION TURNING MOVEMENT VOLUMES - BASELINE 2018

	PEAK HOUR	NORTHBOUND			SOUTHBOUND		EASTBOUND		WESTBOUND					
INTERSECTION		L	Т	R	L	Т	R	L	Т	R	L	Т	R	LOS 1
Imperial Highway/Main Street	AM	514	0	613	0	0	5	0	920	228	555	1,429	0	В
Imperial Highway/Main Street	PM	249	0	488	5	0	1	0	1,156	428	636	810	0	А
Imperial Highway/Pershing Drive	AM	0	0	4	799	0	93	211	346	0	8	410	1,497	А
Imperial Highway/Pershing Drive	PM	0	4	7	991	0	224	166	469	0	0	460	619	А
Pershing Drive/Westchester Parkway	AM	0	1,197	450	71	509	0	0	0	0	296	0	62	А
Pershing Drive/Westchester Parkway	PM	0	630	346	83	699	0	0	0	0	208	0	121	А

NOTES:

The a.m. commuter peak period is identified as 7:00 a.m. to 9:00 a.m., while the p.m. commuter peak period is identified as 4:30 p.m. to 6:30 p.m.

L= Left-turn movements, T = through movements, and R = right-turn movements

LOS = Level of Service

1 Level of Service range: A (excellent) to F (failure).

SOURCE: Ricondo and Associates, Inc., October 2019.

#### PROJECT-GENERATED TRAFFIC AND TRIP DISTRIBUTION

A construction schedule<sup>7</sup> was developed specifically for the Proposed Project and was reviewed to determine the specific construction elements occurring during each month of the proposed construction schedule, and the number of employees estimated for each element. The number of employee vehicle trips were then determined, factoring in assumptions on employee ridesharing. According to a study published by the Southern California Association of Governments (SCAG), the average vehicle occupancy on several regional roadways in the Los Angeles region ranged from approximately 1.15 to 1.30.8 Provided the temporary nature of construction employment and the lower likelihood of rideshare opportunities, a conservative estimate of vehicle occupancy of 1.15 employees per vehicle was assumed. Additionally, for purposes of this analysis, the peak daily employee vehicle trips were assumed to occur during the same month as the peak haul/delivery. It was also assumed that one 8-hour shift would be established for construction activities. For purposes of the analyses, all vehicle trips were converted to "passenger car equivalents" (PCEs) to account for the additional impact that large vehicles, such as haul trucks, would have on

<sup>&</sup>lt;sup>6</sup> Ricondo and Associates, LAX UAL Traffic Volume Adjustment, December 2017.

<sup>&</sup>lt;sup>7</sup> LAX T4 Vehicle Trips.xlsx, October 2019.

Southern California Association of Governments, Regional High-Occupancy Vehicle Lane System Performance Study, November 4, 2004.

roadway traffic operations. As such, the number of construction-related vehicle trips was multiplied by a PCE factor, consistent with the assumptions for previous LAX construction projects. The PCE for employee vehicles was assumed to be 1.0; while the PCE for haul/delivery trucks was assumed to be 2.5. **Table 2** below summarizes the construction peak day activity.

TABLE 2 PEAK CONSTRUCTION TRIPS

HOUR	EMPLOYEE VEHICLES (PCE TRIPS IN)	EMPLOYEE VEHICLES (PCE TRIPS OUT)	HAUL/DELIVERY TRUCKS (PCE TRIPS IN)	HAUL/DELIVERY TRUCKS (PCE TRIPS OUT)	TOTAL VEHICLE TRIPS (PCE)
0:00 - 1:00	-	-	-	-	-
1:00 – 2:00	-	-	-	-	-
2:00 – 3:00	-	-	-	-	-
3:00 - 4:00	-	-	-	-	-
4:00 - 5:00	-	-	-	-	-
5:00 - 6:00	-	-	-	-	-
6:00 - 7:00	84	-	-	-	84
7:00 – 8:00	-	-	13	13	26
8:00 – 9:00	-	-	13	13	26
9:00 - 10:00	-	-	13	13	26
10:00 – 11:00	-	-	13	13	26
11:00 – 12:00	-	-	13	13	26
12:00 – 13:00	-	-	13	13	26
13:00 – 14:00	-	-	13	13	26
14:00 – 15:00	-	-	13	13	26
15:00 – 16:00	-	84	13	13	110
16:00 – 17:00	-	-	13	13	26
17:00 – 18:00	-	-	-	-	-
18:00 – 19:00	-	-	-	-	-
19:00 – 20:00	-	-	-	-	-
20:00 – 21:00	-	-	-	-	-
21:00 – 22:00	-	-	-	-	-
22:00 – 23:00	-	-	-	-	-
23:00 – 24:00	-	-	-	-	-
DAILY TOTAL	84	84	130	130	428

#### NOTES:

PCE = Passenger Car Equivalents (1.0 for employee vehicles, 2.5 for haul/delivery trucks)

The a.m. commuter peak period is identified as 7:00 a.m. to 9:00 a.m., while the p.m. commuter peak period is identified as 4:30 p.m. to 6:30 p.m. SOURCE: Ricondo & Associates, Inc., October 2019.

Consistent with LAX Master Plan Commitment ST-14 (Construction Employee Shift Hours), employees are estimated to be on-site prior to the a.m. commuter peak period of 7:00 a.m. to 9:00 a.m. and off-site prior to the p.m. commuter peak period of 4:30 p.m. to 6:30 p.m. It was conservatively assumed for this analysis that haul/delivery trucks would

operate consistently throughout the day, including during the a.m. and p.m. commuter peak period; therefore, the construction-related vehicles assumed in the analysis were restricted to haul/delivery trucks. Construction staging area access Haul/delivery truck trips were assumed to be limited to Imperial Highway, Pershing Drive and Westchester Parkway in accordance with LAX Master Plan Commitment ST-22 (Designated Truck Routes), which stipulates that deliveries for dirt, aggregate, and other materials will use designated freeways and non-residential streets.

#### CONSTRUCTION TRAFFIC ANALYSIS

As described above, no employee vehicle trips are estimated to occur in either the a.m. or p.m. peak hour periods; however, it was conservatively assumed that haul/delivery trucks would operate during these periods. Per LAX Master Plan Commitment ST-22 (Designated Truck Routes), haul/delivery trucks would be limited to the surrounding freeway system (I-105/I-405), Imperial Highway, Pershing Drive and Westchester Parkway while entering and egressing the construction staging area. Consequently, the following intersections would include construction-related traffic in the peak hour:

- Imperial Highway and Main Street (Westbound Through, Eastbound Through)
- Imperial Highway and Pershing Drive (Westbound Right, Southbound Left)
- Pershing Drive and Westchester Parkway (Northbound Right, Westbound Left)

In accordance with LADOT criteria defined in its Transportation Impact Study Guidelines, an impact is considered to be significant if one of the following thresholds is exceeded:

- The level of service (LOS) is C, its final volume/capacity ratio is 0.701 to 0.80, and the project-related increase in volume/capacity is 0.040 or greater, or
- The LOS is D, its final volume/capacity ratio is 0.801 to 0.90, and the project-related increase in volume/capacity is 0.020 or greater, or
- The LOS is E or F, its final volume/capacity ratio is 0.901 or greater, and the project-related increase in volume/capacity is 0.010 or greater.

The "final volume/capacity ratio" as defined by LADOT consists of the future volume/capacity ratio at an intersection that includes volume from the project, baseline, ambient background growth, and other cumulative development projects, but without proposed intersection traffic mitigation. For purposes of this analysis, the additional 13 PCE haul/delivery truck trips were added to the baseline 2018 traffic volumes (shown below in **Table 3**) to assess the percent traffic increase caused by construction-related traffic. The additional 13 PCE trips caused by haul/delivery truck trips would account for less than two percent of the total traffic in the westbound through and eastbound through movements of Imperial Highway and Main Street. Similarly, the additional construction-related trips would account for less than two percent of the total traffic in the southbound left movement of Imperial Highway and Pershing Drive. The additional construction-related trips would account for greater than two percent of the total traffic in the westbound right movement of Imperial Highway and Pershing Drive and the northbound right and westbound left movements of Pershing Drive and Westchester Parkway. However, each of these intersections were estimated to operate at LOS A; therefore, based on the criteria described above, it is estimated that no significant intersection impacts would occur as a result of the additional construction-related trips.

TABLE 3 CONSTRUCTION TRAFFIC ANALYSIS

INTERSECTION	PEAK HOUR	INTERSECTION MOVEMENT	BASELINE VOLUME	ADDITIONAL PCE TRIPS	TOTAL VOLUME	PERCENT INCREASE
Imperial Highway/Main Street	AM	Westbound Through	1,429	13	1,442	0.9%
Imperial Highway/Main Street	PM	Westbound Through	810	13	823	1.6%
Imperial Highway/Main Street	AM	Eastbound Through	920	13	933	1.4%
Imperial Highway/Main Street	PM	Eastbound Through	1,156	13	1,169	1.1%
Imperial Highway/Pershing Drive	AM	Westbound Right	1,497	13	1,510	0.8%
Imperial Highway/Pershing Drive	PM	Westbound Right	619	13	632	2.1%
Imperial Highway/Pershing Drive	AM	Southbound Left	799	13	812	1.6%
Imperial Highway/Pershing Drive	PM	Southbound Left	991	13	1,004	1.3%
Pershing Drive/Westchester Parkway	AM	Northbound Right	450	13	463	2.9%
Pershing Drive/Westchester Parkway	PM	Northbound Right	346	13	359	3.8%
Pershing Drive/Westchester Parkway	AM	Westbound Left	296	13	309	4.4%
Pershing Drive/Westchester Parkway	PM	Westbound Left	208	13	221	6.3%

NOTES:

PCE=Passenger Car Equivalents

The a.m. commuter peak period is identified as 7:00 a.m. to 9:00 a.m., while the p.m. commuter peak period is identified as 4:30 p.m. to 6:30 p.m. SOURCE: Ricondo and Associates, Inc., October 2019.

#### LAX MASTER PLAN COMMITMENTS AND MITIGATION MEASURES

This analysis incorporates traffic-related mitigation and control measures identified in previous LAWA EIRs. A total of 13 applicable LAX Master Plan commitments and mitigation measures were identified to address traffic impacts, including:

C-1. Establishment of a Ground Transportation/Construction Coordination Office. LAWA is to establish this office for the life of the construction projects to coordinate deliveries, monitor traffic conditions, advise motorists and those making deliveries about detours and congested areas, and monitor and enforce delivery times and routes. LAWA will periodically analyze traffic conditions on designated routes during construction to see whether there is a need to improve conditions through signage and other means.

This office may undertake a variety of duties, including but not limited to:

- Inform motorists about detours and congestion by use of static signs, changeable message signs, media announcements, Airport website, etc.;
- Work with Airport police and the Los Angeles Police Department to enforce delivery times and routes;
- Establish staging areas;
- Coordinate with police and fire personnel regarding maintenance of emergency access and response times;
- Coordinate roadway projects of Caltrans, City of Los Angeles, and other jurisdictions with those of the Airport construction projects;
- Monitor and coordinate deliveries;
- Establish detour routes;

Work with residential and commercial neighbors to address their concerns regarding construction activity;
 and

- Analyze traffic conditions to determine the need for additional traffic controls, lane restriping, signal modifications, etc.
- C-2. Construction Personnel Airport Orientation. All construction personnel will be required to attend an
  Airport project-specific orientation (preconstruction meeting) that includes where to park, where staging areas
  are located, information regarding construction policies, etc.
- ST-9. Construction Deliveries. Construction deliveries requiring lane closures shall receive prior approval from
  the Construction Coordination Office. Notification of deliveries shall be made with sufficient time to allow for
  any modifications of approved traffic detour plans.
- **ST-12. Designated Truck Delivery Hours.** Truck deliveries shall be encouraged to use nighttime hours and shall avoid the peak periods of 7:00 a.m. to 9:00 a.m. and 4:30 p.m. to 6:30 p.m.
- **ST-14. Construction Employee Shift Hours.** Shift hours that do not coincide with the heaviest commuter traffic periods (7:00 a.m. to 9:00 a.m., 4:30 p.m. to 6:30 p.m.) will be established. Work periods will be extended to include weekends and multiple work shifts, to the extent possible and necessary.
- ST-16. Designated Haul Routes. Every effort will be made to ensure that haul routes are located away from sensitive noise receptors.
- ST-17. Maintenance of Haul Routes. Haul routes on off-Airport roadways will be maintained periodically and will comply with City of Los Angeles or other appropriate jurisdictional requirements for maintenance. Minor striping, lane configurations, and signal phasing modifications will be provided as needed.
- ST-18. Construction Traffic Management Plan. A complete construction traffic plan will be developed to designate detour and/or haul routes, variable message and other sign locations, communication methods with Airport passengers, construction deliveries, construction employee shift hours, construction employee parking locations, and other relevant factors.
- ST-22. Designated Truck Routes. For dirt and aggregate and all other materials and equipment, truck deliveries will be on designated routes only (freeways and non-residential streets). Every effort will be made for routes to avoid residential frontages. The designated routes on City of Los Angeles streets are subject to approval by LADOT's Bureau of Traffic Management and may include, but will not necessarily be limited to:
  - Pershing Drive (Westchester Parkway to Imperial Highway)
  - Florence Avenue (Aviation Boulevard to I-405)
  - Manchester Boulevard (Aviation Boulevard to I-405)
  - Aviation Boulevard (Manchester Avenue to Imperial Highway)
  - Westchester Parkway/Arbor Vitae Street (Pershing Drive to I-405)
  - Century Boulevard (Sepulveda Boulevard to I-405)
  - Imperial Highway (Pershing Drive to I-405)
  - La Cienega Boulevard (north of Imperial Highway)
  - Airport Boulevard (Arbor Vitae Street to Century Boulevard)

- Sepulveda Boulevard (Westchester Parkway to Imperial Highway)
- I-405
- I-105

## **APPENDIX C**

# Initial Study/Proposed Negative Declaration Mailing List

#### Terminal 4 Modernization Project: Initial Study/Negative Declaration Mailing List

Agency/Business	Name	Title	Address	Address 2	City	State	Zip	
Airlines for America (A4A)	Tim Pohle	Senior Managing Director - Environmental Affairs	1275 Pennsylvania Avenue NW	Suite 1300	Washington, D.C.		20004	
Alliance for A Regional Solution to Airport Congestion	Denny Schneider	President	7929 Breen Avenue		Westchester	CA	90045	
AvAirPros	Matt Ross		300 N Continental Blvd	Suite 625	El Segundo	CA	90245	
Buchalter Nemer	Barbara Lichman, Ph.D.	Representing the Cities of Inglewood and Culver City	18400 Von Karman Avenue	Suite 800	Irvine	CA	92612	
Cal Trans - District 7	DiAnna Watson	IGR/CEQA Program Manager	100 S. Main Street	Transportation Planning Office, 1-1-C	Los Angeles	CA	90012	
Cal Trans - District 7	Ronald Kosinski	Deputy District Director	100 S. Main Street	Division of Environmental Planning	Los Angeles	CA	90012	
Cal Trans - Div. of Aeronautics	Philip Crimmins	1,119	1415 11th Street	<u> </u>	Sacramento	CA	95814	
California Air Resources Board	Dennis Wade	Air Pollution Specialist, Air Quality Planning & Science	1001 I Street		Sacramento	CA	95814	
California Coastal Commission	Larry Simon	Federal Consistency Coordinator	45 Fremont Street	Suite 2000	San Francisco	CA	94105	
California Public Utilities Commission, Safety and Enforcement		Senior Utilities Engineer	320 W. 4th Street	Suite 500				
Division		J			Los Angeles	CA	90013	
City of Culver City	Carol Schwab	City Attorney	9770 Culver Blvd.	City Hall	Culver City	CA	90232	
City of Culver City	Heather Baker	Assistant City Attorney	9770 Culver Blvd.		Culver City	CA	90232	
City of Culver City	John Nachbar	City Manager	9770 Culver Blvd.		Culver City	CA	90232	
City of El Segundo	Carol Pirsztuk	Mayor Pro Tem	350 Main Street		El Segundo	CA	90245	
City of El Segundo	Don Brann	Councilman	350 Main Street		El Segundo	CA	90245	
City of El Segundo	Scot Nicol	Councilman	350 Main Street		El Segundo	CA	90245	
City of El Segundo	Chris Pimentel	Councilman	350 Main Street		El Segundo	CA	90245	
City of El Segundo	Greg Carpenter	City Manager	350 Main Street		El Segundo	CA	90245	
City of El Segundo	Drew Boyles	Mayor	350 Main Street		El Segundo	CA	90245	
City of El Segundo - Department of Planning and Building	Gregg McClain	Planning Manager	350 Main Street		Li Segundo	C/ C	30243	
Safety	Gregg Meelani	Turning Manager	330 Main Street		El Segundo	CA	90245	
City of Inglewood	James T. Butts, Jr.	Mayor's Office	1 Manchester Blvd.	9th Floor	Inglewood	CA	90301	
City of Inglewood	Kenneth Campos	City Attorney	1 Manchester Blvd.	Suite 860	Inglewood	CA	90301	
City of Inglewood - Residential Sound Insulation Department	Bettye R. Griffith	Director	1 Manchester Blvd.		Inglewood	CA	90301	
City of Lawndale	Robert Pullen-Miles	Mayor	14717 Burin Avenue		Lawndale	CA	90260	
City of Los Angeles	Borja Leon	Mayor's Office	200 N. Spring Street	Suite 303	Los Angeles	CA	90012	
City of Los Angeles	Mike Bonin	Council Member, 11th District	200 N. Spring Street	Room 475	Los Angeles	CA	90012	
City of Los Angeles - City Attorney's Office	David Michaelson	Chief Assistant City Attorney	1 World Way		Los Angeles	CA	90045	
City of Los Angeles - Council District 11 Field Office	Chad Molnar	Chief of Staff	7166 W. Manchester Avenue		Los Angeles	CA	90045	
City of Los Angeles - Department of Transportation	Eddie Guerrero	Senior Transportation Engineer	7166 W. Manchester Avenue		Los Angeles	CA	90045	
City of Los Angeles - Department of Transportation	Sean Haeri	Senior Transportation Engineer	7166 W. Manchester Avenue		Los Angeles	CA	90045	
City of Los Angeles - Department of Water and Power	Charles Holloway		111 N. Hope St.	10th Floor	Los Angeles	CA	90012	
City of Los Angeles - Fire Department	Ralph Terrazas	Chief	200 N. Main Street	16th Floor	Los Angeles	CA	90012	
City of Los Angeles - Police Department	Michel Moore	Chief of Police	100 W. 1st Street	Suite 1072	Los Angeles	CA	90012	
County of Los Angeles	Richard J. Bruckner	Director of Regional Planning	320 W. Temple Street	1390 Hall of Records	Los Angeles	CA	90012	
County of Los Angeles	Thomas Faughnan	Senior Assistant County Counsel	648 Kenneth Hahn Hall Of Administra					
, 3		,		'	Los Angeles	CA	90012-2713	
County of Los Angeles	Mary C. Wickham	County Counsel	648 Kenneth Hahn Hall Of Administra	stion 500 West Temple St.	Los Angeles	CA	90012-2713	
County of Los Angeles	Rosemarie Belda	Assistant County Counsel	648 Kenneth Hahn Hall Of Administra	otion 500 West Temple St.	Los Angeles	CA	90012-2713	
County of Los Angeles	Sachi Hamai	Chief Executive Officer	648 Kenneth Hahn Hall Of Administra	ation 500 West Temple St.	Los Angeles	CA	90012-2713	

#### Terminal 4 Modernization Project: Initial Study/Negative Declaration Mailing List

Agency/Business	Name	Title	Address	Address 2	City	State	Zip
County of Los Angeles - Department of Beaches and Harbors	Charlotte Miyamoto	Chief, Planning Division	13837 Fiji Way		Marina Del Ray	CA	90292
County of Los Angeles - Department of Public Works	Anthony Nyivin	Land Development Division	P.O. Box 1460, 900 S. Fremont Avenue	3rd Floor	Alhambra	CA	91803
County of Los Angeles - Department of Public Works		Planning Division	900 S. Fremont Avenue	11th Floor	Alhambra	CA	91803
County of Los Angeles - Department of Public Works	Christopher Stone	Water Resources	900 S. Fremont Avenue	11th Floor	Alhambra	CA	91803
County of Los Angeles - Department of Regional Planning		Impact Analysis Section	320 W. Temple Street	Room 1356	Los Angeles	CA	90012
County of Los Angeles - Department of Regional Planning:	Bruce Durbin	Supervising Regional Planner	320 W. Temple Street	13th Floor	L A l	<b>C</b> A	00012
Airport Land Use Commission					Los Angeles	CA	90012
County of Orange	Frank Kim	County Executive Officer	333 W. Santa Ana Blvd.		Santa Ana	CA	92701
County of Riverside	Steven Weiss, AICP	Planning Director	4080 Lemon Street	P.O. Box 1409	Riverside	CA	92502-1409
Federal Aviation Administration	Dave Kessler	Environmental Protection Specialist, Western-Pacific Region	777 S. Aviation Blvd.	Suite 150	El Segundo	CA	90245
Federal Aviation Administration	Dave Cushing	Manager, Los Angeles Airports District Office	777 S. Aviation Blvd.	Suite 150	El Segundo	CA	90245
San Gabriel Band of Mission Indians	Anthony Morales	Chief	P.O. Box 693		San Gabriel	CA	91778
Gateway to LA Business Improvement District	Laurie Hughes	Executive Director	9841 Airport Blvd.	Suite 100	Los Angeles	CA	90045
LAX Coastal Area Chamber of Commerce	Christina Davis	President/CEO	9100 S. Sepulveda Blvd.	Suite 210	Los Angeles	CA	90045
LAX Community Liaison - Council District 11	Geoff Thompson		7166 W. Manchester Blvd.		Los Angeles	CA	90045
Los Angeles World Airports	Deborah Ale Flint	Chief Executive Officer	1 World Way		Los Angeles	CA	90045
Los Angeles World Airports	Evelyn Quintanilla	Chief Airport Planner II	6053 W. Century Blvd	Suite 1050	Los Angeles	CA	90045
Los Angeles World Airports	Samantha Bricker	Chief Environmental and Sustainability Officer	1 World Way		Los Angeles	CA	90045
Los Angeles World Airports	Todd Osborne	Terminal Planning	1 World Way		Los Angeles	CA	90045
Rivers & Christian	Jessica Baker	Director of Planning & Design	11661 San Vicente Boulevard	Suite 610	Los Angeles	CA	90049
Los Angeles World Airports - Stakeholder Liaison Office	Brenda Martinez-Sidhom	Stakeholder Liason	6053 W. Century Blvd	Suite 1050	Los Angeles	CA	90045
Los Angeles World Airports Area Advisory Committee	Jamie Gutierrez		1 World Way		Los Angeles	CA	90045
Los Angeles World Airports	David L. Maggard	Deputy Executive Director, Law Enforcement and Homeland Security	6320 W. 96th Street		Los Angeles	CA	90045
Metropolitan Transportation Authority	Michael Cano	Deputy Executive Officer - Countywide Planning and Development	One Gateway Plaza		Los Angeles	CA	90012
Native American Heritage Commission	James Ramos	NAHC Chairperson	1550 Harbor Blvd.	Suite 100	West Sacramento	CA	95691
Neighborhood Council of Westchester/Playa		·	8726 S. Sepulveda Blvd.	PO Box 191A	Los Angeles	CA	90045
Regional Water Quality Control Board	Theresa Rodgers	Los Angeles Region (4)	320 W. 4Th Street	Suite 200	Los Angeles	CA	90013
Shute, Mihaly & Weinberger LLP	Laurel L. Impett	Counsel	396 Hayes Street		San Francisco	CA	94102
Shute, Mihaly & Weinberger LLP	Joseph D. Petta	Counsel	396 Hayes Street		San Francisco	CA	94102
Shute, Mihaly & Weinberger LLP	Osa L. Wolff	Counsel	396 Hayes Street		San Francisco	CA	94102
South Coast Air Quality Management District	lan MacMillan	Manager, Annual Emissions Reports	21865 Copley Drive		Diamond Bar	CA	91765
South Coast Air Quality Management District	Lijin Sun, J.D.	Planning and Rules Manager	21865 Copley Drive		Diamond Bar	CA	91765
Southern California Association of Governments	Rongsheng Luo	Program Manager of Air Quality and Conformity	818 W. 7th Street	12th Floor	Los Angeles	CA	90017
Southern California Association of Governments	Anita Au	Intergovernmental Review	818 W. 7th Street	12th Floor	Los Angeles	CA	90017
State of California - Department of Conservation	David Bunn	Director	801 K. Street	MS 24-01	Sacramento	CA	95814
State of California - Department of Fish & Game Region 5	Warren Wong	Habitat Conservation Program	3883 Ruffin Road		San Diego	CA	92123
State of California - Department of Parks and Recreation, Office of Historic Preservation	Julianne Polanco	State Historic Preservation Officer	1725 23rd Street	Suite 100	Sacramento	CA	95816-7100
State of California - Department of Toxic Subst. Control	Guenther Moskat	CEQA Tracking Center	8800 Cal Center Drive		Sacramento	CA	95826
State of California - Department of Water Resources			P.O. Box 94236		Sacramento	CA	94236
State Office of Historic Preservation	Tristan Tozer	State Historian I	1725 23rd Street	Suite 1100	Sacramento	CA	95816
The Sohagi Law Group	Margaret Sohagi	Partner	11999 San Vicente Blvd.	Suite 150	Los Angeles	CA	90049-5136

#### Terminal 4 Modernization Project: Initial Study/Negative Declaration Mailing List

Agency/Business	Name	Title	Address	Address 2	City	State	Zip
U.S. Customs & Border Protection			1099 S. La Cienega Blvd.		Los Angeles	CA	90045
U.S. Department of Homeland Security - FEMA Region IX	Gregor Blackburn	CFM, Branch Chief	1111 Broadway	Suite 1200	Oakland	CA	94607-4052
U.S. Department of Homeland Security - TSA			5767 Century Blvd.	Suite 300	Los Angeles	CA	90045
U.S. Environmental Protection Agency (EPA), Region 9	Tom Kelly	Air Planning Office (AIR-2)	75 Hawthorne Street		San Francisco	CA	94105
U.S. Immigration & Naturalization Service			380 World Way	P.O. Box N20	Los Angeles	CA	90045
USDA Wildlife Services	Director		3419-A Arden Way		Sacramento	CA	95825
Westchester Town Center Business Improvement District	Karen Dial	President	8929 S. Sepulveda Blvd.	#130	Westchester	CA	90045

### **APPENDIX D**

# Initial Study/Proposed Negative Declaration Newspaper Notice

AFFP
Los Angeles World Airport

### **Proof of Publication**

(2015.5 C.C.P.)

STATE OF CALIFORNIA COUNTY OF LOS ANGELES

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above entitled matter. I am the principal clerk of the printer of the Argonaut, a newspaper of general circulation, printed and published weekly in the City of Argonaut, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of February 19, 1988, modified October 5, 1976, Case Number C47170; that the notice, of which the annexed is a printed copy (set in type no smaller than nonpareil), has published in each regular and entire issue of said newspaper and not been in any supplement thereof on the following dates, to wit:

October 24, 2019

I certify (or declare) under penalty of perjury that the foregoing is true and correct.

Dated at Argonaut, California

This 24th day of October 2019

Ann Turrietta, Legal Clerk, Los Angeles County, California

00005672 00025089

David Plakorus Ricondo 700 7th St., Ste. 1200 Denver, CO 80202

#### City of Los Angeles Los Angeles World Airports

#### PROPOSED TERMINAL 4 MODERNIZATION PROJECT

## NOTICE OF INTENT TO ADOPT A NEGATIVE DECLARATION and LAX SPECIFIC PLAN COMPLIANCE REVIEW

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 on the environment and proposes to adopt a Negative Declaration.

The project site is the existing Terminal 4 (T4) Concourse, and adjacent aircraft parking apron, located within the Central Terminal Area (CTA) of LAX, between Terminal 5 (east) and Tom Bradley International Terminal (west). 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, east of the Tom Bradley International Terminal and north of the South Airfield Complex. Related construction staging activities would occur elsewhere on other Airport property.

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#### **Public Review and Comment:**

The proposed Negative Declaration, Initial Study and LAX Specific Plan Compliance Review for the proposed project will be available for a 20day review period beginning on **October 24, 2019,** 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 **Wednesday, November 13, 2019,** on the LAX website (www. lawa.org/en/lawa-our-lax, under "Submit a Comment") or by mail to:

Los Angeles World Airports Environmental Planning Division Attention: Brenda Martinez-Sidhom, Airport Planner P.O. Box 92216 Los Angeles, CA 90009-2216

As a covered entity under Title II of the Americans with Disabilities Act, the City of Los Angeles does not discriminate on the basis of disability and, upon request, will provide reasonable accommodation to ensure equal access to its programs, services, and activities. Alternative formats in large print, braille, audio, and other formats (if possible), will be provided upon request. For additional information, please contact: LAWA's Coordinator for Disability Services at (424) 646-5005 or via California Relay Service at 711. Si desea esta información en español, llame a (800) 919-3766.

#### **Daily Breeze**

400 Continental Blvd, Suite 600 El Segundo, CA 90245 310-543-6635 Fax: 310-316-6827

> RICONDO 700 17TH STREET, SUITE 1200 DENVER, CO 80202

Ad Order Number: 0011326127

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Customer's Reference David Plakorus

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Publication: Daily Breeze

Publication Dates: 10/24/2019

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Payment Amount: \$784.90 Payment Method: Credit Card

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#### PROPOSED TERMINAL 4 MODERNIZATION PROJECT

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Los Angeles World Airports Environmental Planning Division Attention: Brenda Martinez-Sidhom, Airport Planner P.O. Box 92216 Los Angeles, CA 90009-2216

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Pub Oct 24, 2019(1t)DB(11326127)

#### **Daily Breeze**

400 Continental Blvd, Suite 600 El Segundo, CA 90245 310-543-6635 Fax: 310-316-6827

5248341

RICONDO 700 17TH STREET, SUITE 1200 DENVER, CO 80202

## PROOF OF PUBLICATION (2015.5 C.C.P.)

## STATE OF CALIFORNIA County of Los Angeles

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of THE DAILY BREEZE, a newspaper of general circulation, printed and published in the City of Torrance\*, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of County of Los Angeles, State of California, under the date of June 10, 1974, Case Number SWC7146. The notice, of which the annexed is a printed copy (set in type not smaller than nonpareil), has been published in each regular and entire issue of said newspaper and not in any supplement thereof on the following dates, to wit:

#### 10/24/2019

I certify (or declare) under the penalty of perjury that the foregoing is true and correct.

Dated at Torrance, California
On this 24th day of October, 2019.

#### Pauline Jernandez

#### Signature

\*The Daily Breeze circulation includes the following cities: Carson, Compton, Culver City, El Segundo, Gardena, Harbor City, Hawthorne, Hermosa Beach, Inglewood, Lawndale, Lomita, Long Beach, Manhattan Beach, Palos Verdes Peninsula, Palos Verdes, Rancho Palos Verdes, Rancho Palos Verdes Estates, Redondo Beach, San Pedro, Santa Monica, Torrance and Wilmington.

Legal No.

0011326127

City of Los Angeles Los Angeles World Airports

#### PROPOSED TERMINAL 4 MODERNIZATION PROJECT

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Los Angeles World Airports
Environmental Planning Division

Attention: Brenda Martinez-Sidhom, Airport Planner P.O. Box 92216 Los Angeles, CA 90009-2216

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Pub Oct 24, 2019 (1t) DB (11326127)

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Decoration (ND) CITY CLERK NOS NG 19 045 AD PROPOSED TERMINAL 4 MODERNIZATION

PROPOSED TERMINAL 4 MODERNIZATION PROJECT

NOTICE OF INTENT TO ABBUT A NIGATIVE DECLARATION and LAX SPECIFIC PLAN COMPLIANCE RIVIEW
Persont on the Store of California Public Resources colle Article of the Valdornia Businessmental Quality Art (CTV). As a manufact, the COS of Low Angeles, through Cos Angeles, World Airports, Jun prepared an Brookl Study for the previous described only the Under CTOO, the Cos situation of one angeleanet impacts on the to-transment and proposes to adopt a Negamic Declaration. The protect site is the existing Terminal 4 (14) Conception, and application approach processing and proposes and proposes and proposes are provided to the Conception of the Conception and proposes and proposed approach processing the Conception and proposed processing approach decided.

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Plate Los Angeles, CA 90094
West-baser-loy-04 Village Branch Library, 7114 W.
Marcheart Ascent, Los Angeles, CA 90045
Weiters ceremonts most be authorized by no fater their
900 p.m. Pacific Ossloght Terme of Wednesday,
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As a occored earlier under Title II of the American sith Dissibilities Act the Cay of Los Angoles does not doctrimorate on the facts of drastfoly and, apost request, will provide reasonable accessmication to cassue apad access to its programs, services, and activates. Alternative formation of integer ones barille, andia, and other formats of possibles, will be provided upon request. For additional information places or market LAWA's Constitution for Oscillates, Securice at 243, 446-5805 or vot Osfifering Relay Securice at 711, 51 does not afternation on an expand, Basec a polity 919-1766.

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7638001 - Los Angeles Times Page 2 of 2



PROOF OF PUBLICATION (2015.5 C.C.P.)

STATE OF CALIFORNIA County of Los Angeles

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the action for which the attached notice was published.

I am a principal clerk of the Los Angeles Times, which was adjudged a newspaper of general circulation on May 21, 1952, Cases 598599 for the City of Los Angeles, County of Los Angeles, and State of California. Attached to this Affidavit is a true and complete copy as was printed and published on the following date(s):

Oct 24, 2019

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated at El Segundo, California on this 24 day of October, 2019.

[signature]

2300 E. Imperial Hwy. El Segundo, CA 90245