FINAL ENVIRONMENTAL ASSESSMENT AND FINAL GENERAL CONFORMITY DETERMINATION

LOS ANGELES INTERNATIONAL AIRPORT (LAX)
LANDSIDE ACCESS MODERNIZATION PROGRAM

Los Angeles International Airport
Los Angeles, Los Angeles County, California

Prepared for:

LOS ANGELES WORLD AIRPORTS

U.S. DEPARTMENT OF TRANSPORTATION
FEDERAL AVIATION ADMINISTRATION
As lead Federal Agency pursuant to the National Environmental Policy Act of 1969

Prepared by:

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APPENDICES O – P

Appendix O

Final General Conformity Determination

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1. Introduction

This Final General Conformity Determination is provided in support of the proposed improvements associated with the Los Angeles International Airport (LAX) Landside Access Modernization Program. The potential environmental impacts of these improvements are being assessed by the Federal Aviation Administration (FAA) in an Environmental Assessment (EA), including the detailed air quality analysis that supports this Final General Conformity Determination. The anticipated effects of the proposed federal actions to air quality are discussed in Section 5.1 of the EA, and further assessed here for the Proposed Action Alternative, to satisfy the general conformity requirements of the Federal Clean Air Act. Comments were sought on the Draft General Conformity Determination, along with the Draft EA, from August 18, 2017 through September 26, 2017. The FAA has made this Final General Conformity Determination prior to making a determination on the EA and the federal actions associated with the LAX Landside Access Modernization Program.

2. Conformity Rules and Criteria

Section 176(c) of the Clean Air Act (42 U.S.C. 7506(c)) requires any entity of the federal government that engages in, supports, or in any way provides financial support for, licenses or permits, or approves any activity to demonstrate that the action conforms to the applicable State Implementation Plan (SIP) required under Section 110(a) of the Clean Air Act (42 U.S.C. 7410(a)) before the action is otherwise approved. In this context, conformity means that such federal actions must be consistent with a SIP's purpose of eliminating or reducing the severity and number of violations of National Ambient Air Quality Standards (NAAQS) and achieving expeditious attainment of those standards. Each federal agency (including the FAA) must determine that any action that is proposed by the agency and that is subject to the regulations implementing the conformity requirements will conform to the applicable SIP before the action is taken. Specifically, a responsible federal agency is required to determine if the action "conforms" to the applicable SIP by ensuring that the action does not:

- cause or contribute to any new violation of any NAAQS;
- increase the frequency or severity of any existing violations of any NAAQS; or
- delay the timely attainment of any NAAQS or any required interim emission reductions or other milestones.

Federal actions subject to conformity are divided into two categories: transportation conformity actions and general conformity actions. The Transportation Conformity Regulations (40 CFR Part 51 and Part 93) cover certain surface transportation actions relating to highway and transit. General conformity actions are all other Federal actions in nonattainment and maintenance areas that are not covered by the Transportation Conformity Regulations.

2.1 Transportation Conformity Requirements

Transportation conformity ensures that certain surface transportation-related actions of the federal government and recipients of federal highway and transit assistance are consistent with air quality goals as established in the SIP. This is done through procedures for the consideration of metropolitan transportation plans/regional transportation plans (MTPs/RTPs), shorter-term transportation improvement programs (TIPs), and Federal Highway Administration (FHWA) or Federal Transit Administration (FTA) projects as defined by 40 CFR § 93.101.

Transportation conformity determinations are made by the federal agency overseeing the improvements to the transportation network, either the FHWA or the FTA. Metropolitan Planning Organizations (MPO) make conformity determinations for metropolitan transportation plans and TIPs in metropolitan areas, while transportation agencies, including state Departments of Transportation (DOTs), conduct the analyses associated with project-level conformity. The MPO for the Los Angeles metropolitan area is the Southern California Association of Governments (SCAG). A formal interagency consultation process is required for developing SIPs, MTPs/RTPs, TIPs, and making conformity determinations. As a result, the consultation process typically includes the U.S. Environmental Protection Agency (USEPA), FHWA, FTA, state and local transportation agencies, and air quality agencies.

Certain federally funded or approved highway and transit projects subject to transportation conformity are required to meet project-level conformity requirements. To facilitate the review of transportation conformity for projects in Southern California, the SCAG has formed a working group called the Transportation Conformity Working Group (TCWG).[1] Membership of the SCAG's TCWG includes federal (USEPA, FHWA, FTA), state (Air Resources Board or CARB, Caltrans), regional (South Coast Air Quality Management District or SCAQMD, SCAG), and sub-regional (County transportation commissions) agencies, and other stakeholders.

Consistent with the Transportation Conformity and General Conformity Rules, and at the request of the air quality agencies consulted during preparation of the air quality protocol[2] for the LAX Landside Access Modernization Program (including the SCAQMD and USEPA), it was agreed that construction emissions associated with the LAX Landside Access Modernization Program would be evaluated under the general conformity regulations. The project-level operational emissions associated with the LAX Landside Access Modernization Program are also considered under the general conformity regulations, because FHWA determined that it has no federal action or jurisdiction over any part of the LAX Landside Access Modernization Program. Thus, the project-level "hotspot" requirements of the Transportation Conformity Rules do not apply to the LAX Landside Access Modernization Program.

The SCAG *2016-2040 Regional Transportation Plan/Sustainable Communities Strategies (RTP/SCS)* accounts for on-road motor vehicle and transit vehicle emissions on the network of regionally significant roads, highways and streets. The RTP/SCS includes all regionally significant elements of the LAX Landside Access Modernization Program project and the project's design concept and scope have not changed significantly from those that were included in the regional emissions analysis for that transportation plan and TIP. Thus, Los Angeles complies with the requirements of 40 CFR 93.121 that recipients of federal surface transportation projects show that regionally significant projects come from conforming RTPs.

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1 Southern California Association of Governments, "Transportation Conformity Working Group (TCWG)," available: http://www.scag.ca.gov/programs/Pages/TCWG.aspx (accessed May 3, 2017).

2 A copy of the air quality protocol is included in Appendix F, Air Quality, of the LAX Landside Access Modernization Program Final Environmental Assessment.

2.2 General Conformity Requirements

Projects that are not addressed under Transportation Conformity are evaluated under general conformity. The process of evaluating projects under the General Conformity Rules generally starts with:

1) determining if the project is exempt,

2) determining if the project is presumed to conform, and

3) preparation of an applicability analysis, if the project is not exempt or presumed to conform, including an evaluation of whether project emissions would exceed *de minimis* thresholds under the regulations;

4) for projects that exceed *de minimis* levels, a General Conformity Determination is required.

The LAX Landside Access Modernization Program is neither exempt from nor presumed to conform with the General Conformity Regulations.

General conformity applies to any criteria pollutants for which an area is in nonattainment or maintenance status. An applicability analysis under general conformity consists of preparing an emissions inventory for all project-related direct and indirect emissions and comparing that result with the *de minimis* thresholds. The regulation defines the thresholds based on pollutant and attainment/non-attainment designation. The thresholds applicable at LAX under the General Conformity Rules are shown in Section 4.3. Emissions for the LAX Landside Access Modernization Program were compared to these *de minimis* thresholds. 40 CFR § 93.159(d) notes that when comparing emissions to *de minimis* thresholds, the following scenarios must be considered:

a) emissions in the year of attainment or the farthest year for which emissions are projected in the maintenance plan;

b) the year in which the total of direct and indirect project-related emissions are expected to be the greatest on an annual basis; and

c) any year for which the SIP has an applicable emissions budget.

If emissions in all of these scenarios are less than *de minimis*, no further analysis is needed.

If emissions are above *de minimis* levels, a General Conformity Determination is required. In a General Conformity Determination, the rule allows for the following avenues to show conformity:

1. A written determination from the state/local air quality agency stating that the project emissions, together with all other emissions in the non-attainment or maintenance area, would not exceed the emissions budget in the SIP.
2. A written commitment from the Governor, or the Governor's designee for SIP actions, to include the emissions in a revised SIP (this automatically results in a call for a SIP revision).
3. Offsetting or mitigating project emissions so that there is no net increase within the non-attainment or maintenance area.

4. The applicable MPO determines that the emissions from the project, or portion thereof, are included in a conforming transportation plan and transportation improvement program.

3. Description of Proposed Action

The LAX Landside Access Modernization Program (the Proposed Action Alternative) consists of several primary components. The centerpiece is an Automated People Mover (APM) system with 6 stations, which would provide free, fast, convenient, and reliable access to the Central Terminal Area (CTA) for passengers, employees, and other users of LAX, 24 hours a day. The APM system would transport passengers between the CTA and the other main components of the Proposed Action Alternative located east of the CTA, including a state-of-the-art, Consolidated Rental Car Facility (CONRAC), new public parking facilities and multiple locations for passenger pick-up and drop-off. In addition, the APM system would include a station at the multi-modal/transit facility at W. 96th Street/Aviation Boulevard planned by Metro as a separate and independent project to provide the opportunity for passengers to access the Metro regional rail system. The LAX Landside Access Modernization Program would reduce traffic volumes and congestion within the CTA, as well as on local streets, by shifting passengers to the APM system for the first/last mile of their trip to the Airport, and providing a seamless connection to the Metro transit system.

Project components associated with the LAX Landside Access Modernization Program include:

- APM system with six APM stations connecting the CTA to new ground transportation facilities proposed between Sepulveda Boulevard and Interstate 405;
- Passenger walkway systems connecting the APM stations to passenger terminals, parking garages, and ground transportation facilities;
- Modifications to existing passenger terminals and parking garages within the CTA for passenger walkway system connections and vertical circulation to the arrival, departure, and concourse levels;
- Intermodal transportation facilities (ITF) that would provide pick-up and drop-off areas outside the CTA for private vehicles and commercial shuttles;
- CONRAC designed to consolidate car rental agencies in a centralized location with access to the CTA via the APM;
- Roadway improvements designed to improve access to the proposed facilities and the CTA and reduce traffic congestion in neighboring communities; and
- Utilities needed to support the LAX Landside Access Modernization Program.

To the extent possible, construction laydown and staging areas would be located adjacent to or within the construction sites for the proposed facilities or at existing LAX construction staging areas.

Enabling projects required to implement the LAX Landside Access Modernization Program include:

- Demolition of parking garages P2A, P2B, and P5 and construction of replacement garages in the CTA that may result in an increase of approximately 1,100 parking spaces within the CTA;
- Relocation of LAWA administrative offices housed in the Clifton Moore Administration building (1 World Way, also known as Admin East) to the existing LAWA-owned Skyview Center at 6033 and 6053 West Century Boulevard;
- Demolition of the Clifton Moore Administration building (1 World Way);
- Relocation of existing rental car facilities;
- Demolition of the existing restaurant building located at 9601 Airport Boulevard on property owned by LAWA;
- Demolition of the Metro LAX City Bus Center bus terminal located north of West 96th Street on property owned by LAWA;
- Demolition of the USO and U.S. Customs and Border Protection Facility located on the lower level of the CTA between parking garages P1 and P2A and south of Terminal 2 - uses would be accommodated in the ground floor of the Theme Building;
- Improvements of portions of Center Way within the CTA;
- Demolition of existing hangars/buildings located at 6150 and 6190 West Century Boulevard owned by LAWA that are currently leased for storage - replacement facilities would be constructed on-Airport property;
- Demolition of the Reliant Medical Center located on LAWA-owned property at 9601 South Sepulveda Boulevard - existing uses could be accommodated either on-Airport property or elsewhere;
- Completion of the Manchester Square acquisition program including the Stella Middle Charter Academy and Bright Star Secondary Charter Academy facilities located at 5431 West 98th Street; and
- Acquisition of other parcels where the APM or roadway improvements are proposed including, but not limited to:
  - 6141 West Century Boulevard owned by Metro and leased by an off-airport parking operator;
  - 9606/9610 Bellanca Avenue occupied by Secom International; and
  - 9600 South Sepulveda Boulevard owned by WallyPark;
- Closure and demolition of roads;
- Demolition of the Travelodge Hotel located at 5547 W. Century Boulevard located on LAWA-owned property; and
- Relocation or abandonment of existing utilities located within and adjacent to roadways.

Figure 1 provides an overview of the Proposed Action. The Proposed Action would not affect or change any airfield components, including the runways, taxiways, or aircraft arrival and departure procedures.

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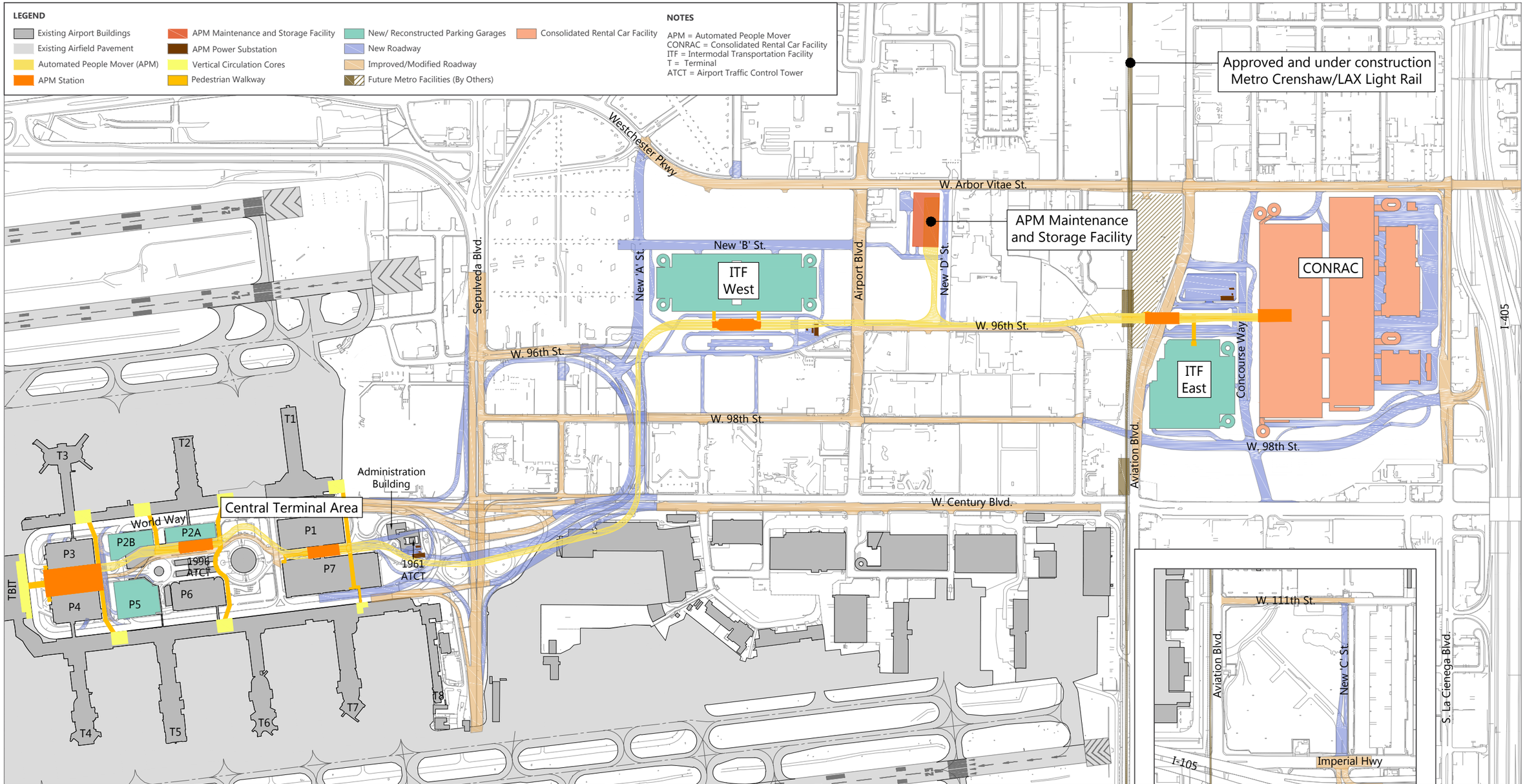

NOTE: Improvements depicted are conceptual only and do not represent engineered design.
SOURCE: HNTB Corp., Los Angeles International Airport Layout Plan, July 2012; MapLAX, July 2016.
PREPARED BY: Ricondo & Associates, Inc., December 2017.

FIGURE 1

LAX Landside Access Modernization Program Components

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4. Applicability Analysis

As stated previously, the first step in a general conformity evaluation is an analysis of whether the requirements apply to a federal action proposed to be taken in a nonattainment or a maintenance area. Unless exempted by the regulations or otherwise presumed to conform, a proposed federal action requires a general conformity determination for each pollutant where the total of direct and indirect emissions caused by the proposed action would equal or exceed an annual *de minimis* emission level. If emissions are lower than the applicable *de minimis* threshold, no further analysis is needed.

4.1 Attainment Status of South Coast Air Basin

LAX is located in the South Coast Air Basin (Basin), which is a sub-region of the SCAQMD's jurisdiction. The Basin is designated as a federal nonattainment area for ozone (O_3), fine particulate matter with an aerodynamic diameter less than or equal to 2.5 micrometers ($PM_{2.5}$), and lead (Pb). Nonattainment designations under the Clean Air Act for O_3, $PM_{2.5}$, and respirable particulate matter with an aerodynamic diameter less than or equal to 10 micrometers (PM_{10}) are categorized into levels of severity based on the level of concentration above the standard, which is also used to set the required attainment date. Attainment/maintenance means that the pollutant is currently in attainment and that measures are included in the SIP to ensure that the NAAQS for that pollutant are not exceeded again (maintained). **Table 1** presents the federal attainment designations for each of the criteria air pollutants.

Table 1: South Coast Air Basin Attainment Status

POLLUTANT	NATIONAL STANDARDS [1/]
Ozone (O_3) 8-Hour Standard	Nonattainment – Extreme
Ozone (O_3) 1-Hour Standard	(Nonattainment – Extreme) [2/]
Carbon Monoxide (CO)	Attainment – Maintenance
Nitrogen Dioxide (NO_2)	Attainment – Maintenance
Sulfur Dioxide (SO_2)	Attainment
Respirable Particulate Matter (PM_{10})	Attainment – Maintenance
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment – Serious [3/]
Lead (Pb)	Nonattainment

NOTES:

1/ Status as of June 17, 2016.

2/ The South Coast Air Basin had not attained the 1-hour O_3 standard by the time it was replaced with the 1997 8-hour O_3 standard. Therefore, the State Implementation Plan for the South Coast must still contain demonstrations that the 1-hour O_3 standard will be attained.

3/ Classified as moderate nonattainment for 2012 NAAQS and serious nonattainment for 2006 NAAQS. Thus, for conformity purposes the serious nonattainment *de minimis* threshold was used.

SOURCE: U.S. Environmental Protection Agency, "Green Book Nonattainment Areas," available: https://www.epa.gov/green-book (accessed February 2017).

PREPARED BY: Ricondo & Associates, Inc., February 2017.

4.2 Exemptions from General Conformity Requirements

As noted previously, the general conformity requirements apply to a proposed federal action if the total project-related direct and indirect emissions equal or exceed *de minimis* emission levels. The only exceptions to this applicability criterion are the topical exemptions summarized below. However, the emissions attributable to the Proposed Action Alternative do not meet any of these exempt categories.

- Actions which would result in no emissions increase or an increase in emissions that is clearly below the *de minimis* levels (40 CFR 93.153(c)(2)). Examples include administrative actions and routine maintenance and repair.
- Actions where the emissions are not reasonably foreseeable (40 CFR 93.153(c)(3)).
- Actions which implement a decision to conduct or carry out a conforming program (40 CFR 93.153 (c)(4)).
- Actions which include major new or modified sources requiring a permit under the New Source Review (NSR) program (40 CFR 93.153(d)(1)).
- Actions in response to emergencies or natural disasters (40 CFR 93.153(d)(2)).

- Actions which include air quality research not harming the environment (40 CFR 93.153(d)(3)).
- Actions which include modifications to existing sources to enable compliance with applicable environmental requirements (40 CFR 93.153(d)(4)).
- Actions which include emissions from remedial measures carried out under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) that comply with other applicable requirements (40 CFR 93.153(d)(5)).

In addition to these topical exemptions, the general conformity regulations allow each federal agency to establish a list of activities that are presumed to conform (40 CFR 93.153(f)). The FAA has published its "Presumed to Conform Actions Under General Conformity" in the Federal Register on July 30, 2007. This list consists of 15 airport project categories for FAA actions that are presumed to conform. However, the Proposed Action Alternative is not exempting any elements as presumed to conform.[3]

4.3 *de minimis* Emission Thresholds

As noted in Section 4.1, LAX is located in a non-attainment or maintenance area for a number of pollutants. The *de minimis* thresholds applicable to the Proposed Action Alternative are shown in **Table 2**.

[3] Some sources, such as concrete batch plants, are covered under LAWA's existing Title V permit; however, to be conservative they were included in the air quality conformity analysis.

Table 2: General Conformity *de minimis* Thresholds

NAAQS	ATTAINMENT STATUS (SEVERITY) [1/]	POLLUTANT(S)	*DE MINIMIS* THRESHOLD (TONS PER YEAR)
Carbon Monoxide (CO)	Attainment - Maintenance	CO	100
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment – Serious [2/]	$PM_{2.5}$	70
Lead (Pb)	Nonattainment	Pb	25
Nitrogen Dioxide (NO_2)	Attainment - Maintenance	NO_2	100
Ozone (O_3)	Non-attainment – Extreme [3/]	NO_X	10
		VOC	10
Respirable Particulate Matter (PM_{10})	Attainment - Maintenance	PM_{10}	100

NOTES:

1/ Status as of June 17, 2016.

2/ Classified as moderate nonattainment for 2012 NAAQS and serious nonattainment for 2006 NAAQS. Thus, for conformity purposes the serious nonattainment *de minimis* threshold was used.

3/ The South Coast Air Basin had not attained the 1-hour O_3 standard by the time it was replaced with the 1997 8-hour O_3 standard. Therefore, the State Implementation Plan for the South Coast must still contain demonstrations that the 1-hour O_3 standard will be attained.

SOURCES: General Conformity Rule (40 CFR Part 93, Subpart B); USEPA; U.S. Environmental Protection Agency, "Green Book Nonattainment Areas," available: https://www.epa.gov/green-book (accessed February, 2017).

PREPARED BY: Ricondo & Associates, Inc., February 2017.

5. Applicability Analysis for Proposed Federal Action

5.1 Methodology

Attachment A contains a discussion of the approach for estimating emissions for this general conformity evaluation, as well as details regarding the significant assumptions and calculation methods used to estimate emissions.

5.2 Estimated Emissions

Six criteria pollutants[4] were evaluated in the LAX Landside Access Modernization Program EA air quality analysis for the General Conformity Determination, namely carbon monoxide (CO), nitrogen dioxide (NO_2), O_3, PM_{10}, and $PM_{2.5}$, and sulfur dioxide (SO_2), for both construction and operations of the No Action Alternative and the Proposed Action Alternative. The total of direct and indirect emissions for the proposed federal action is the difference between the emissions of the No Action and Proposed Action Alternatives. Because the Los Angeles metropolitan area is in attainment for SO_2, it is not included in the conformity analysis below.

In preparing the applicability analysis, two key types of emissions are included: direct (construction of the Proposed Action Alternative) and indirect (operation of the facilities once completed). The total of these direct and indirect emissions are compared to the applicable *de minimis* threshold for purposes of determining if a General Conformity Determination is required.

[4] Although the South Coast Air Basin is designated as a federal nonattainment area for lead, it was not evaluated in the air quality analysis for the General Conformity Determination since no leaded fuel is provided at LAX by LAWA; thus, the Proposed Action Alternative would have negligible impacts of lead levels in the South Coast Air Basin.

5.2.1 CONSTRUCTION EMISSIONS (DIRECT)

Construction of the Proposed Action Alternative would be conducted in two phases. Phase 1 of the Proposed Action Alternative would include the vast majority of the proposed access/transportation-related improvements, such as the APM, the CONRAC, the ITF West, the ITF East, and most of the roadway improvements, planned to be operational by 2024. Phase 2 of the Proposed Action Alternative would mainly consist of additional roadway improvements at the W. Century Boulevard/Sepulveda Boulevard interchange; these elements would likely be constructed by 2030. Criteria pollutant emissions inventories were prepared for each construction year; a criteria pollutant dispersion analysis was performed for the peak year of construction. The emissions inventory for construction activities associated with the Proposed Action Alternative is presented in **Table 3**.

Table 3: Proposed Action Alternative Construction Emissions Inventory

	ESTIMATED ANNUAL EMISSIONS OF CRITERIA POLLUTANTS (TONS/YEAR)				
CONSTRUCTION YEAR	**CO**	**VOC**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
Phase 1					
2018	21	5	18	2	1
2019	33	4	36	3	1
2020	29	4	35	3	1
2021	19	2	20	2	1
2022	10	1	11	1	1
2023	8	<1	7	1	<1
2024	3	<1	2	<1	<1
Phase 2					
2025	<1	<1	<1	<1	<1
2026	<1	<1	<1	<1	<1
2027	<1	<1	<1	<1	<1
2028	<1	<1	<1	<1	<1
2029	<1	<1	<1	<1	<1
2030	<1	<1	<1	<1	<1
Peak Annual Emissions	*33*	*5*	*36*	*3*	*1*

SOURCE: CDM Smith, 2017.
PREPARED BY: Ricondo & Associates, Inc., January 2017.

5.2.2 OPERATIONAL EMISSIONS (INDIRECT)

Criteria pollutant emissions associated with the No Action Alternative for 2024, 2030, and 2035 are presented in **Table 4**. Without improvements to the roadway network, local traffic conditions would deteriorate and, thus, mobile source emissions would generally be higher under the No Action Alternative when compared to the Proposed Action Alternative. However, given changes in building area and systems associated with the Proposed Action, electricity usage may change, particularly in regards to new demand of energy systems as a result of new construction.

Table 4: No Action Alternative Operational Emissions Inventories

	EMISSIONS (TONS/YEAR)		
POLLUTANT	**2024**	**2030**	**2035**
CO	879	710	579
VOC	25	20	15
NO_X	120	114	97
SO_X	3	3	3
PM_{10}	144	154	154
$PM_{2.5}$	46	49	48

SOURCE: CDM Smith, 2017.
PREPARED BY: Ricondo & Associates, Inc., February 2017.

Criteria pollutant emissions associated with the Proposed Action Alternative for 2024, 2030, and 2035 are presented in **Table 5**. The emissions inventories presented below include vehicular emissions, as would be influenced by implementation of the Proposed Action Alternative, as well as facility space and water heating (natural gas combustion), and secondary emissions from electrical demand associated with the Proposed Action Alternative. **Table 6** identifies the incremental project-related operational emissions for 2024, 2030, and 2035 as compared to the No Action Alternative.

Table 5: Proposed Action Alternative Operational Emissions Inventories

	EMISSIONS (TONS/YEAR)		
POLLUTANT	**2024**	**2030**	**2035**
CO	834	621	507
VOC	25	19	15
NO_X	118	111	96
SO_X	3	3	3
PM_{10}	138	137	137
$PM_{2.5}$	45	44	44

SOURCE: CDM Smith, 2017.
PREPARED BY: Ricondo & Associates, Inc., February 2017.

Table 6: Project-Related Operational Emissions

	EMISSIONS (TONS/YEAR)		
POLLUTANT	**2024**	**2030**	**2035**
CO	-45	-89	-72
VOC	0	-1	0
NO_X	-2	-3	-1
SO_X	0	0	0
PM_{10}	-6	-17	-17
$PM_{2.5}$	-1	-5	-4

NOTE: Project-related emissions reflect the emissions of the Proposed Action Alternative Project minus the No Action Alternative.

SOURCE: CDM Smith, 2017.

PREPARED BY: Ricondo & Associates, Inc., February 2017.

5.2.3 TOTAL DIRECT AND INDIRECT EMISSIONS FROM THE PROPOSED ACTION ALTERNATIVE

As shown in Table 3, direct emissions have been calculated for each year of construction, estimated from 2018 to 2030. To estimate the annual indirect emissions for the same years as the direct construction emissions, a linear interpolation was conducted as it is not possible to estimate annual operational emissions at this time. **Table 7** summarizes the total direct and indirect emissions from the project. Note that none of the main components (APM, CONRAC, East ITF, complete West ITF) of the Proposed Action Alternative are scheduled to be operational prior to 2024, although some roadway improvements and a portion of the West ITF parking garage may open prior to that date. However, to be conservative, it was assumed that no operational benefit of the roadway improvements or provision of parking outside of the CTA would occur; thus, indirect emissions from operations were assumed to be zero, as shown in Table 7.

Table 7 (1 of 2): Proposed Action Alternative Total Direct and Indirect Emissions

	ESTIMATED TOTAL DIRECT AND INDIRECT ANNUAL EMISSIONS (TONS/YEAR)				
YEAR	**CO**	**VOC**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
2018 (total direct and indirect)	21	5	18	2	1
Construction	21	5	18	2	1
Operation	0	0	0	0	0
2019 (total direct and indirect)	33	4	36	3	1
Construction	33	4	36	3	1
Operation	0	0	0	0	0
2020 (total direct and indirect)	29	4	35	3	1
Construction	29	4	35	3	1
Operation	0	0	0	0	0
2021 (total direct and indirect)	19	2	20	2	1
Construction	19	2	20	2	1
Operation	0	0	0	0	0
2022 (total direct and indirect)	10	1	11	1	1
Construction	10	1	11	1	1
Operation	0	0	0	0	0
2023 (total direct and indirect)	8	0	7	1	0
Construction	8	<1	7	1	<1
Operation	0	0	0	0	0
2024 (total direct and indirect)	-42	<1	0	-5	0
Construction	3	<1	2	<1	<1
Operation	-45	0	-2	-6	-1
2025 (total direct and indirect)	-52.3	-0.2	-2.2	-7.8	-1.5
Construction	<1	<1	<1	<1	<1
Operation	-52.3	-0.2	-2.2	-7.8	-1.5
2026 (total direct and indirect)	-59.7	-0.3	-2.3	-9.7	-2.0
Construction	<1	<1	<1	<1	<1
Operation	-59.7	-0.3	-2.3	-9.7	-2.0

Table 7 (2 of 2): Proposed Action Alternative Total Direct and Indirect Emissions

	ESTIMATED TOTAL DIRECT AND INDIRECT ANNUAL EMISSIONS (TONS/YEAR)				
YEAR	**CO**	**VOC**	**NO_X**	**PM_{10}**	**$PM_{2.5}$**
2027 (total direct and indirect)	-67.0	-0.5	-2.5	-11.5	-2.5
Construction	<1	<1	<1	<1	<1
Operation	-67.0	-0.5	-2.5	-11.5	-2.5
2028 (total direct and indirect)	-74.3	-0.7	-2.7	-13.3	-3.0
Construction	<1	<1	<1	<1	<1
Operation	-74.3	-0.7	-2.7	-13.3	-3.0
2029 (total direct and indirect)	-81.7	-0.8	-2.8	-15.2	-3.5
Construction	<1	<1	<1	<1	<1
Operation	-81.7	-0.8	-2.8	-15.2	-3.5
2030 (total direct and indirect)	-89.0	-1.0	-3.0	-17.0	-4.0
Construction	<1	<1	<1	<1	<1
Operation	-89.0	-1	-3	-17	-4
***de minimis* Threshold**	*100*	*10*	*10*	*100*	*70*
Exceeds *de minimis* Threshold	No	No	**Yes**	No	No

NOTE: Operational emissions for years 2025 through 2029 have been linearly interpolated from 2024 and 2030 data.

SOURCE: CDM Smith, 2017.

PREPARED BY: Ricondo & Associates, Inc., April 2017.

5.3 Comparison to *de minimis* Emission Thresholds and Applicability Determination

As shown in Table 7, the total direct and indirect Project-related emissions were compared to the applicable *de minimis* threshold. As noted in the General Conformity Rule, the following emissions must be identified:

- Emissions in the year of attainment or the farthest year for which emissions are projected in the maintenance plan; the farthest projected in the 2012 AQMP (current approved SIP) is 2030. Thus, emissions in this applicability analysis focus on those related to the Proposed Action Alternative through 2030.
- The year in which the total of direct and indirect project-related emissions are expected to be the greatest on an annual basis. The years of greatest project-related emissions are in 2019 for CO, NO_X,

and PM_{10}, and $PM_{2.5}$, and in 2018 for VOC. Emissions in these years are entirely from construction activities; the operations-related emissions associated with a more efficient roadway system do not start to offset the construction emissions until 2024.

- Any year for which the SIP has an applicable emissions budget. If emissions in all of these scenarios are less than *de minimis* levels, no further analysis is needed. The current approved SIP has an emission budget for virtually every year. Thus, the emissions were estimated for all years as shown in Table 7.

Peak project-related emissions occur in 2019 for CO, NO_X, and PM_{10} and $PM_{2.5}$, and in 2018 for VOC. Only for NO_X do the emissions exceed the *de minimis* threshold; in 2019 NO_X emissions would be 36 tons per year (TPY), whereas the *de minimis* threshold is 10 TPY. Therefore, a General Conformity Determination is only required for NO_X.

6. General Conformity Determination

6.1 Designation of Applicable SIP

CARB designates both air quality management districts and air pollution control districts within California for the purpose of implementing and enforcing ambient air quality standards on a regional or airshed basis. These agencies must prepare regional plans (Air Quality Management Plans [AQMPs]) to support the broader SIP, as well as to meet the goals of the California Clean Air Act.

Periodically, SCAQMD must prepare and submit to CARB an AQMP to demonstrate how the Basin will attain and maintain the NAAQS and the California ambient air quality standards. The AQMP contains extensive emissions inventories of all emission sources in the Basin, as well as various control measures applicable to most of these sources. Once CARB approves the AQMP, it is submitted to USEPA for approval as part of the SIP. The Final 2012 AQMP was adopted by the SCAQMD Governing Board and submitted to the USEPA in December 2012.[5] USEPA approved it as part of the SIP on September 3, 2014.[6] SCAQMD released the Draft Final 2016 AQMP for public review in December 2016 and adopted the Final 2016 AQMP on March 3, 2017, and has submitted it to CARB and USEPA for review.[7] The 2016 AQMP is a comprehensive and integrated Plan primarily focused on addressing O_3 standards and is expected to serve as the future SIP for the Basin. It is not anticipated that the 2016 AQMP will be approved by USEPA prior to the final General Conformity Determination for the LAX Landside Access Modernization Program. As a result, the 2012 AQMP is the applicable SIP for purposes of this General Conformity Determination.

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5 South Coast Air Quality Management District, "Air Quality Management Plans (AQMP) - Archive," available: http://www.aqmd.gov/home/library/clean-air-plans/air-quality-mgt-plan/aqmp-archive.

6 U.S. Environmental Protection Agency, "Approval and Promulgation of Implementation Plans; California; South Coast 1-Hour and 8-Hour Ozone and Approval of Air Quality Implementation Plan Revisions; State of California; South Coast VMT Emissions Offset Demonstrations; Final Rules", *Federal Register*, Vol. 79, No. 170, September 3, 2014, effective October 3, 2014.

7 South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, March 2017.

6.2 Comparison to SIP Emission Inventories

SCAQMD has determined that the emissions from the LAX Landside Access Modernization Program construction are included in the general conformity budget for NO_X and VOC emissions in the AQMP for the duration of the Phase 1 LAX Landside Access Modernization Program implementation. As discussed above, inclusion of emissions of a proposed action in the applicable SIP is one of the criteria that can be used to demonstrate conformity.

As noted in the May 10, 2016 letter from SCAQMD to LAWA (see **Attachment B**), SCAQMD has confirmed the availability of emissions reserved in the SIP for "general conformity" projects like the LAX Landside Access Modernization Program. Anticipating that general conformity would require some allocation of project emissions, SCAQMD developed a general conformity budget when the 2012 AQMP was prepared and approved. The AQMP documentation (*Final 2012 AQMP: Appendix III Base and Future Year Emission Inventory* see pages III-2-52 and III-2-53) notes that SCAQMD reserved 1 ton of NO_X per day and 0.2 ton of VOC per year in the AQMP for future general conformity projects (and thus was approved by USEPA in the SIP). This would translate to 365 tons of NO_X and 73 tons of VOC. In its May 10, 2016 letter to LAWA, SCAQMD confirmed that a portion of the NO_X and VOC emissions budget is available to the LAX Landside Access Modernization Program, as shown in **Table 8**, and is not being used for other projects.

Additionally, the 2016 AQMP, adopted by SCAQMD in March 2017, includes the LAX Landside Access Modernization Program construction NO_x and VOC emissions and notes that these emissions have been set aside in the general conformity set-aside account.[8]

[8] South Coast Air Quality Management District, *Final 2016 Air Quality Management Plan*, Appendix III, Base and Future Year Emission Inventory, Tables III-2-25 and III-2-26, pp. III-2-86 – III-2-87, March 2017.

Table 8: SCAQMD NO_X and VOC Emission Budget Available for the LAX Landside Access Modernization Program

	POLLUTANT	
YEAR	NO_X (TPY)	VOC (TPY)
2017	82	10
2018	164	32
2019	194	41
2020	198	42
2021	122	37
2022	63	23
2023	53	21

SOURCE: South Coast Air Quality Management District, May 10, 2016.
PREPARED BY: Ricondo & Associates, Inc., May 2016.

Based on the estimated NO_x construction emissions identified in Table 3 for Phase 1 and total emissions identified in Table 7, all NO_X emissions resulting from construction of the Proposed Action Alternative would be within the general conformity budget allocation noted in the May 10, 2016 letter. Therefore, emissions from the LAX Landside Access Modernization Program would conform to the SIP and meet the criteria for conformity under the General Conformity Regulations.

6.3 Comparison to the NAAQS

Conformity means that a proposed federal action will not cause or contribute to any new violation of any NAAQS; not increase the frequency or severity of any existing violation of any NAAQS; and not delay timely attainment of any NAAQS or any required interim emission reductions or other milestones (42 U.S.C. 7506(c)(1)(B)). The general conformity regulations allow that local and/or areawide air quality modeling may be used to demonstrate that these requirements are met in support of a positive conformity determination (40 CFR 93.158(a)(3) and 40 CFR 93.158(a)(4)(i)). This evaluation used dispersion modeling to predict the impacts of all pollutant emissions. Input and output data for specified dispersion model runs are available upon request.

Proposed Action Alternative concentrations were developed for 2024, 2030, and 2035, and the results of the dispersion analysis for each year are provided in **Tables 9**, **10**, and **11**, respectively. As shown, emissions associated with the Proposed Action Alternative would not exceed the NAAQS thresholds. Therefore, no significant operational air quality impacts would occur under the Proposed Action Alternative when compared to the No Action Alternative.

Table 9: 2024 Proposed Action Alternative Concentrations

POLLUTANT	AVERAGING PERIOD	INCREMENTAL PEAK (µg/m³) 1/	BACKGROUND (µg/m³)	TOTAL (µg/m³)	THRESHOLD (µg/m³)	EXCEEDS THRESHOLD?
CO	1-hr	78	3,565	3,643	40,000	No
CO	8-hr	37	2,778	2,815	10,000	No
NO_2	1-hr	6	116	122	188	No
NO_2	Annual	1	23	24	100	No
SO_2	1-hr	<1	16	16	196	No
SO_2	3-hr	<1	39 2/	39	1,300	No
SO_2	Annual	<1	3	3	80	No
PM_{10}	24-hr	2.8	35	37.8	150	No
$PM_{2.5}$	24-hr	1.0	30	31.0	35	No
$PM_{2.5}$	Annual	0.5	11.4	11.9	12	No

NOTES:

1/ The Incremental Peak concentration was determined by calculating the differences between the future Proposed Action Alternative and the future No Action Alternative scenarios at each receptor, then selecting the maximum value across all receptors.

2/ The 3-hour SO_2 background concentration was assumed to be the same as the highest 1-hour SO_2 background concentration.

SOURCE: CDM Smith, 2017.

PREPARED BY: Ricondo & Associates, Inc., February 2017.

Table 10: 2030 Proposed Action Alternative Concentrations

POLLUTANT	AVERAGING PERIOD	INCREMENTAL PEAK (µg/m³) 1/	BACKGROUND (µg/m³)	TOTAL (µg/m³)	THRESHOLD (µg/m³)	EXCEEDS THRESHOLD?
CO	1-hr	61	3,565	3,626	40,000	No
CO	8-hr	31	2,778	2,809	10,000	No
NO_2	1-hr	19	116	135	188	No
NO_2	Annual	7	23	30	100	No
SO_2	1-hr	<1	16	16	196	No
SO_2	3-hr	<1	39 2/	39	1,300	No
SO_2	Annual	<1	3	3	80	No
PM_{10}	24-hr	3.1	35	38.1	150	No
$PM_{2.5}$	24-hr	1.0	30	31.0	35	No
$PM_{2.5}$	Annual	0.5	11.4	11.9	12	No

NOTES:

1/ The Incremental Peak concentration was determined by calculating the differences between the future Proposed Action Alternative and the future No Action Alternative scenarios at each receptor, then selecting the maximum value across all receptors.

2/ The 3-hour SO_2 background concentration was assumed to be the same as the highest 1-hour SO_2 background concentration.

SOURCE: CDM Smith, 2017.

PREPARED BY: Ricondo & Associates, Inc., February 2017.

Table 11: 2035 Proposed Action Alternative Concentrations

POLLUTANT	AVERAGING PERIOD	INCREMENTAL PEAK (µg/m³) 1/	BACKGROUND (µg/m³)	TOTAL (µg/m³)	THRESHOLD (µg/m³)	EXCEEDS THRESHOLD?
CO	1-hr	49	3,565	3,614	40,000	No
CO	8-hr	25	2,778	2,803	10,000	No
NO_2	1-hr	21	116	137	188	No
NO_2	Annual	7	23	30	100	No
SO_2	1-hr	<1	16	16	196	No
SO_2	3-hr	<1	39 2/	39	1,300	No
SO_2	Annual	<1	3	3	80	No
PM_{10}	24-hr	3.1	35	38.1	150	No
$PM_{2.5}$	24-hr	1.0	30	31	35	No
$PM_{2.5}$	Annual	0.5	11.4	11.9	12	No

NOTES:

1/ The Incremental Peak concentration was determined by calculating the differences between the future Proposed Action Alternative and the future No Action Alternative scenarios at each receptor, then selecting the maximum value across all receptors.

2/ The 3-hour SO_2 background concentration was assumed to be the same as the highest 1-hour SO_2 background concentration.

SOURCE: CDM Smith, 2017.

PREPARED BY: Ricondo & Associates, Inc., February 2017.

6.4 Consistency with Requirements and Milestones in Applicable SIP

The General Conformity Regulations state that, notwithstanding the other requirements of the rule, a proposed action may not be determined to conform unless the total of direct and indirect emissions from the action is in compliance or consistent with all relevant requirements and milestones in the applicable SIP (40 CFR 93.158(c)). This includes but is not limited to such issues as reasonable further progress schedules, assumptions specified in the attainment or maintenance demonstration, prohibitions, numerical emission limits, and work practice standards. This section briefly addresses how the Proposed Action Alternative was assessed for SIP consistency for this evaluation.

6.4.1 APPLICABLE REQUIREMENTS FROM USEPA

USEPA has promulgated, and will continue to promulgate, numerous requirements to support the goals of the Clean Air Act with respect to the NAAQS. Typically, these requirements take the form of rules regulating emissions from significant new sources, including emission standards for major stationary point sources and classes of mobile sources, as well as permitting requirements for new major stationary point sources. Since states have the primary responsibility for implementation and enforcement of requirements under the Clean Air

Act and can impose stricter limitations than USEPA, the USEPA requirements often serve as guidance to the states in formulating their air quality management strategies.

6.4.2 APPLICABLE REQUIREMENTS FROM CARB

In California, to support the attainment and maintenance of the NAAQS, CARB is primarily responsible for regulating emissions from mobile sources. In fact, USEPA has delegated authority to CARB to establish emission standards for on-road and some non-road vehicles separate from the USEPA vehicle emission standards, although CARB is preempted by the Clean Air Act from regulating emissions from many non-road mobile sources, including aircraft.

6.4.3 APPLICABLE REQUIREMENTS FROM SCAQMD

To support the attainment and maintenance of the NAAQS in the Basin, SCAQMD is primarily responsible for regulating emissions from stationary sources. As noted above, SCAQMD develops and updates its AQMP regularly to support the California SIP. While the AQMP contains rules and regulations geared to attain and maintain the NAAQS, these rules and regulations also have the much more difficult goal of attaining and maintaining the California ambient air quality standards.

6.4.4 CONSISTENCY WITH APPLICABLE REQUIREMENTS

In operating LAX, LAWA already complies with, and will continue to comply with, a myriad of rules and regulations implemented and enforced by federal, state, regional, and local agencies to protect and enhance ambient air quality in the Basin. In particular, due to the long persistence of challenges to attain the ambient air quality standards in the Basin, the rules and regulations promulgated by CARB and SCAQMD are among the most stringent in the U.S. LAWA will continue to comply with all existing applicable air quality regulatory requirements for activities over which it has direct control and will meet in a timely manner all regulatory requirements that become applicable in the future. Likewise, LAWA actively encourages all tenants and users of its facilities to comply with applicable air quality requirements.

6.5 Final General Conformity Determination

As noted earlier, the general conformity applicability analysis shows that a General Conformity Determination is only required for NO_X emissions. As noted in the General Conformity Regulations, the approaches to demonstrating conformity with the SIP include:

1. A written determination from the state/local air quality agency stating that the project emissions, together with all other emissions in the non-attainment or maintenance area, would not exceed the emissions budget in the SIP.
2. A written commitment from the Governor, or the Governor's designee for SIP actions, to include the emissions in a revised SIP (this automatically results in a call for a SIP revision).
3. Offsetting or mitigating project emissions so that there is no net increase within the non-attainment or maintenance area.

4. The applicable MPO determines that the emissions from the project, or portion thereof, are included in a conforming transportation plan and transportation improvement program.

Attachment B shows that SCAQMD has confirmed that a portion of the SIP General Conformity budget has been reserved for this project (avenue 1 above). In addition, portions of this project are also confirmed by SCAG as being within a conforming transportation plan (RTP). Therefore, the FAA has successfully shown that the LAX Landside Access Modernization Program will conform with the current approved SIP.

7. Public Participation

A General Conformity Determination has a publication process that is similar to the NEPA EA process (40 CFR Part 93.155 and 93.156). A draft General Conformity Determination must be issued with a 30-day agency and public comment period (similar to that which occurs on the Draft EA). Upon the responses to comments by the FAA, a Final General Conformity Determination is issued. Notices of the availability of the Draft and Final General Conformity Determination must be published in a daily newspaper of general circulation.

To meet the General Conformity Requirements, the Draft General Conformity Determination was included as Appendix O to the Draft EA for the LAX Landside Access Modernization Program. In addition, a public notice of its availability was published in three local newspapers along with the Draft EA notice of availability (see Appendix P of the Final EA). This notification began the public review and comment period on the Draft General Conformity Determination, which ran from August 18, 2017 through September 26, 2017. No comments on the Draft General Conformity Determination were received during the public review and comment period. The Final General Conformity Determination is being published concurrently with the Final EA.

8. Findings and Conclusions

As part of the environmental review of the LAX Landside Access Modernization Program, FAA conducted a general conformity evaluation pursuant to 40 CFR 93 Subpart B. The General Conformity Regulations apply to actions at LAX requiring FAA financial support or approval, because the Basin where LAX is situated is a nonattainment area for O_3, $PM_{2.5,}$ and Pb, and maintenance areas for CO, $NO_{2,}$ and PM_{10}. FAA conducted the general conformity evaluation following all regulatory criteria and procedures and in coordination with USEPA, CARB, SCAQMD, and SCAG. FAA published the Draft General Conformity Determination for public review on August 18, 2017.

Based on the analysis in the Draft and Final General Conformity Determination, FAA concludes that the LAX Landside Access Modernization Program as designed conforms to the purpose of the approved SIP and is consistent with all applicable requirements.

Attachment A

General Conformity Determination Methodology

1. General Conformity Determination Methodology

The air quality analysis conducted for the Los Angeles International Airport (LAX) Landside Access Modernization Program General Conformity Determination addresses construction and operations emissions. Activities analyzed include efforts associated with construction and operations of the proposed landside improvements covered under the General Conformity Regulations of the Clean Air Act. The construction emissions generally include on-site and off-site construction equipment, fugitive dust, fugitive volatile organic compounds (VOCs), and worker vehicle trips that would occur during the construction period, estimated to be approximately 6 years in Phase 1 and up to 10 years in Phase 2. Operational sources specific to the LAX Landside Access Modernization Program have also been included in the General Conformity Determination analysis, including ground access vehicles and busing operations.

1.1 Scope of Analysis

This section discusses the overall approach to the General Conformity Determination air quality analysis, including: scenarios and years analyzed, types of analysis performed, and pollutants considered.

1.1.1 SCENARIOS/ANALYSIS YEARS

The air quality analysis conducted for the LAX Landside Access Modernization Program General Conformity Determination addresses construction-related impacts for the approximately 6 years of proposed construction activities, and operations-related impacts for the future horizon year of 2024. The year 2024 represents completion of Phase 1 of the LAX Landside Access Modernization Program. The Phase 2 roadway elements are expected to be completed by 2030; thus, construction emissions were calculated for the 5-year construction period. The year 2030 analysis considers the operational effects of Phase 1 and Phase 2 roadway elements of the LAX Landside Access Modernization Program. A future year analysis of 2035 considers operational emissions five years after completion of the Program.

Analysis for the following years and conditions was conducted in the General Conformity Determination:

- Future 2024
  - No Action – existing Airport facilities with regional and Airport activity levels associated with 2024.
  - Proposed Action – including the Phase 1 LAX Landside Access Modernization Program with 2024 regional and Airport activity levels
- Future 2030
  - No Action – existing Airport facilities with regional and Airport activity levels associated with 2030.
  - Proposed Action – including the Phase 1 LAX Landside Access Modernization Program and the Phase 2 roadway elements of the Landside Access Modernization Program with 2030 regional and Airport activity levels.
- Future 2035
  - No Action – existing Airport facilities with regional and Airport activity levels associated with 2035.
  - Proposed Action – including the Phase 1 LAX Landside Access Modernization Program and the Phase 2 roadway elements of the Landside Access Modernization Program with 2035 regional and Airport activity levels.

Additional analyses were performed to estimate construction emissions, the peak emission year, and other years specified in the State Implementation Plan (SIP).

1.1.2 POLLUTANTS OF INTEREST

Six criteria pollutants were evaluated in the air quality analysis for the General Conformity Determination, namely carbon monoxide (CO), nitrogen dioxide (NO_2), ozone (O_3), particulate matter (PM_{10}), and fine particulate matter ($PM_{2.5}$). Although the South Coast Air Basin is designated as a federal nonattainment area for lead (Pb), it was not evaluated in the air quality analysis for the General Conformity Determination, since no leaded fuel is provided at LAX by LAWA; therefore, the Proposed Action Alternative would have negligible impacts of lead levels in the South Coast Air Basin. Similarly, although sulfur dioxide (SO_2) is a criteria pollutant, as the South Coast Air Basin is in attainment for SO_2, and the proposed LAX Landside Access Modernization Program would not be a significant source of SO_2, it was not included in the General Conformity Determination.

Following standard industry practice and USEPA guidance, the evaluation of O_3 was conducted by evaluating precursor pollutant emissions of VOC and nitrogen oxides (NO_x). O_3 is a secondary regional pollutant and ambient concentrations can only be predicted using regional photochemical models that account for all sources of precursors, which is beyond the scope of this analysis. Therefore, no photochemical O_3 modeling was conducted for this General Conformity Determination.

1.2 Direct and Indirect Project Emission Inventory Methodology

The criteria pollutant emission inventories were developed using standard industry software/models and federal, State, and locally approved methodologies. Results of the emission inventories were compared to general conformity *de minimis* thresholds and emissions inventories and budgets included in the SIP.

It is important to note that, while FAA requires the use of the Aviation Environmental Design Tool (AEDT) for airport air quality evaluation, that tool is not usable for the type of development reflected in the LAX Landside Access Modernization Program. The AEDT focuses on emissions of aircraft and ground support equipment. Since the LAX Landside Access Modernization Program would not affect those sources, the LAX Landside Access Modernization Program General Conformity Determination relied on other modeling tools that are available to evaluate ground access/on-road vehicle emissions. EMFAC2014 was used to quantify emissions from on-road sources, whereas construction emissions were quantified using the models listed in **Table 1**.

Table 1: Construction Sources Pollutant and Emission Model Summary

CONSTRUCTION SOURCE	POLLUTANT	MODEL/REFERENCE
Off-Road Equipment	CO, SO_2	OFFROAD2007, OFFROAD2011 [1/]
	VOC, NO_X, PM_{10}	2011 Inventory Model (commonly referred to as OFFROAD2011) [2/]
	$PM_{2.5}$	CARB Speciation Profiles (& Size Distributions) [3/]
On-Road On-Site Equipment	CO, VOC, NO_X, PM_{10}	EMFAC2014 [4/]
On-Road Off-Site Equipment	CO, VOC, NO_X, PM_{10}	EMFAC2014 [4/]
Fugitive Dust	PM_{10}, $PM_{2.5}$	USEPA AP42 [5/]
Fugitive VOCs	VOC	CalEEMod [6/]

NOTES:

1/ California Air Resources Board, OFFROAD2007 Model, available: http://www.arb.ca.gov/msei/documentation.htm (accessed May 24, 2016).

2/ California Air Resources Board, 2011 Inventory Model for In-Use Off-Road Equipment, available: www.arb.ca.gov/msei/categories.htm#offroad_motor_vehicles (accessed May 24, 2016).

3/ South Coast Air Quality Management District, "Final – Methodology to Calculate Particulate Matter (PM) 2.5 and PM 2.5 Significance Thresholds," October 2006, available: http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/pm-2-5-significance-thresholds-and-calculation-methodology (accessed May 24, 2016); California Environmental Protection Agency, Air Resources Board, "Speciation Profiles Used in ARB Modeling," April 15, 2016, available: http://www.arb.ca.gov/ei/speciate/speciate.htm#assnfrac (accessed May 31, 2016).

4/ California Air Resources Board, EMFAC2014 Model, available: http://www.arb.ca.gov/msei/categories.htm#emfac2014 (accessed May 24, 2016).

5/ U.S. Environmental Protection Agency, "Emissions Factors & AP 42, Compilation of Air Pollutant Emission Factors," available: http://www.epa.gov/ttn/chief/ap42/index.html (accessed May 24, 2016).

6/ California Air Pollution Control Officers Association, California Emissions Estimator Model (CalEEMod) Version 2013.2.2, prepared by ENVIRON International Corporation and the California Air Districts, available: http://www.caleemod.com/ (accessed on May 24, 2016)

SOURCE: Ricondo & Associates, Inc., May 2016.
PREPARED BY: Ricondo & Associates, Inc., May 2016.

Mass emissions inventories were prepared for each year of construction; these inventories identified peak year construction emissions associated with completing Phase 1 of the proposed LAX Landside Access Modernization Program between 2018 and 2024. Mass emissions inventories were also prepared for 2025 through 2030 to determine the peak year construction emissions associated with Phase 2. Operational emissions were calculated for the future 2024, 2030, and 2035 Proposed Action and No Action Alternatives. The overview of the inventory process is provided below for both construction and operations.

Construction:

- Direct and indirect Project-related emissions:
  - Identify construction-related emissions sources that will likely be needed to build the LAX Landside Access Modernization Program.
  - Capture construction activities of site-preparation, construction of paved and concrete surfaces, building erection-related activities, material delivery, and construction employee work commute.
  - Prepare emissions inventory of construction emissions for all construction years.

Operations:

- Identify operational emission sources whose emissions would change due to the LAX Landside Access Modernization Program.
- Develop annual and daily operational emissions inventories for the identified sources.

Dispersion Analysis:

- A dispersion analysis was conducted for comparison to the National Ambient Air Quality Standards (NAAQS) to determine if the Proposed Action Alternative would create a new exceedance or exacerbate an existing exceedance.

1.2.1 CONSTRUCTION SOURCES

Emissions inventories were prepared for CO, VOC, NO_x, SO_2, PM_{10}, and $PM_{2.5}$ for the following construction activities:

- Off-Road On-Site Equipment
- On-Road On-Site Equipment
- On-Road Off-Site Equipment
- Fugitive Dust
- Fugitive VOCs

To estimate construction emissions, resource requirements and activity schedules were developed by LAWA. The construction activity data includes types and specifications for both on-road and off-road construction equipment, and total operating hours by equipment type by month for each applicable construction activity/project. Equipment specifications include equipment type, manufacturer, model, capacity, horsepower,

fuel consumption, and fuel type, as appropriate. Using this data, monthly, quarterly, and annual construction emissions estimates were developed. Peak month average day emissions estimates were developed by identifying the peak month of construction emissions and dividing the emissions by the number of days in that month.

A summary of construction source pollutants and models/references used is shown in Table 1.

1.2.1.1 Off-Road On-Site Equipment Emissions Inventory

Off-road construction equipment includes dozers, loaders, sweepers, and other heavy-duty construction equipment that is not licensed for travel on public roadways. Using a compiled listing of all off-road construction equipment types, models, and horsepower ratings, emission rates were obtained/derived from the sources shown in Table 1.

Daily emission inventories for off-road equipment were calculated by multiplying the appropriate emission factor by the horsepower, load factor, and daily operational hours for each type of equipment as shown in **Equation 1**.

Equation 1: Off-Road On-Site Equipment Emissions

$$E = HP \times L \times n \times H \times EF$$

Where:

E = emissions (lb/day)

HP = project equipment horsepower

L = load factor

n = number of pieces of equipment in a specified equipment category

H = hours per day of equipment operation

EF = emission factor (lb/hp-hr)

SOURCE: Ricondo & Associates, Inc., January 2015.
PREPARED BY: Ricondo & Associates, Inc., January 2015.

1.2.1.2 On-Road On-Site Equipment Emissions Inventory

On-road on-site equipment includes shuttle vans transporting construction employees from the employee parking areas to the construction site, on-site pickup trucks, crew vans, water trucks, dump trucks, haul trucks and other on-road vehicles (i.e., vehicles licensed to travel on public roadways). Exhaust emissions from on-road on-site sources were calculated using peak construction year emission factors for CO, VOC, NOx, PM_{10}, and $PM_{2.5}$ from CARB's emission factor model EMFAC2014.

On-road on-site equipment types from the Proposed Action Alternative construction schedule were matched with vehicle types corresponding to EMFAC2011 vehicle classes.[1] Other factors including region, calendar year, season, model year, speed and fuel type were also selected for each equipment type. The EMFAC2014 model outputs emission rates (grams/mile) for each equipment type. To calculate the total emissions, roundtrip distances for on-site travel were determined for each equipment category and substituted into **Equation 2** shown below. The EMFAC factors account for start-up, running and idling. In addition, VOC emission factors include diurnal, hot soak, running, and resting emissions, and the PM_{10} and $PM_{2.5}$ factors include tire and brake wear.

Equation 2: On-Road On-Site Equipment Emissions

$$E = VMT \times EF$$

Where:

E = emissions (lb/day)

VMT = vehicle miles traveled per day

EF = emission factor (lb/mile)

SOURCE: Ricondo & Associates, Inc., January 2015.
PREPARED BY: Ricondo & Associates, Inc., January 2015.

1.2.1.3 On-Road Off-Site Equipment Emissions Inventory

On-road off-site trip types identified in the construction schedule include personal vehicles used by construction employees to access the construction employee parking areas, and also include equipment and material delivery/haul vehicles. Emissions from these trips were calculated using EMFAC2014 for all criteria pollutants. An assumption of workers per crew and vehicle miles traveled (VMT) per day were based on the Proposed Action construction schedule. In general, the EMFAC2014 emissions factors were multiplied by the total VMT for each vehicle type to obtain emissions in pounds per day, similar to Equation 2.

Construction-worker vehicle emissions include: vehicle exhaust, tire wear, brake wear, and paved road dust using South Coast Air Quality Management District (SCAQMD) default assumptions for vehicle fleet mix, travel distance, and average travel speeds.

[1] Although EMFAC2014 is the current release of the model, the vehicle classes are based on either EMFAC2007 or EMFAC2011; therefore, EMFAC2011 vehicle classes are the most recent versions.

1.2.1.4 Fugitive Dust

Additional sources of PM_{10} and $PM_{2.5}$ emissions associated with construction activities are related to fugitive dust. Fugitive dust includes re-suspended road dust from both off- and on-road vehicles, dust from grading, loading and unloading, hauling and storage activities, as well as rock crushing operations and batch plants. Fugitive dust emissions (PM_{10} and $PM_{2.5}$) were calculated using the guidance from the USEPA's Compilation of Air Pollutant Emission Factors (AP-42)[2] and SCAQMD's California Environmental Quality Act (CEQA) Air Quality Handbook.[3] Fugitive dust emissions were calculated as outlined in AP-42 for the following construction activities:

- Vehicles traveling on paved roads. All haul trucks, flatbed trucks, and automobiles were assumed to travel on paved roads.
- On-site construction activities (grading, crushing, loading, hauling and storage) were calculated based on LAWA's current Title V permit for batch plants. The emissions were calculated based on construction material demand using the emissions equation in the permit. Operations activities of an on-site construction batch plant, if applicable.
- An on-site rock crusher. An overall emission factor was derived by summing emission factors for crushing activities including tertiary crushing, fines crushing, and screening, if applicable.

Monthly fugitive dust emissions were calculated for each piece of construction equipment or construction activity, from which annual and daily fugitive dust emissions were determined.

1.2.1.5 Fugitive VOCs (Paving and Painting)

Construction materials that can be sources of VOC emissions include hot-mix asphalt paving, parking lot striping, and architectural coating. VOC emissions from asphalt paving operations result from the evaporation of the petroleum distillate solvent, or diluent, used to liquefy asphalt cement. Asphalt paving emissions were calculated using the SCAQMD recommended approach included in the CalEEMod model.

1.2.2 OPERATIONAL SOURCES

Operational emissions provide an indication of the changes in emissions that completing and operating the Proposed Action Alternative would have when comparing operational emissions without the LAX Landside Access Modernization Program.

The FAA's Terminal Area Forecast for LAX, published in January 2016, forecasts demand for air travel in 2024, 2030, and 2035 at LAX. The forecast predicts an increase in total aircraft activity and total passenger activity at LAX. Implementation of the LAX Landside Access Modernization Program would not increase the number of flights or type of aircraft using the airfield because it only affects landside development and efficiency of the

[2] U.S. Environmental Protection Agency, AP-42 - Compilation of Air Pollutant Emission Factors, Fifth Edition, 1995; as updated at https://www3.epa.gov/ttn/chief/ap42/index.html .

[3] South Coast Air Quality Management District, CEQA Air Quality Handbook, 1993 and on-line updates.

landside/roadway system. The LAX Landside Access Modernization Program would also not result in changes to air traffic flight patterns or aircraft taxi patterns. Finally, the LAX Landside Access Modernization Program would not change the number of passengers at LAX; it would only change how they access the airport and terminal facilities.

Therefore, changes in surface vehicle traffic patterns and trips that would occur because of the LAX Landside Access Modernization Program facilities, as well as emissions from new stationary facilities and energy demand for the proposed LAX Landside Access Modernization Program facilities, are the only operational sources that were analyzed for impacts.

Daily and annual emissions were calculated for each source for future years 2024, 2030, and 2035 for the Proposed Action and No Action conditions.

1.2.2.1 Mobile Sources

Mobile sources include on-road vehicles. On-road vehicles include the automobiles, trucks, buses, and other motor vehicles that operate on the public roadways and in the parking areas at and near LAX.

No direct criteria pollutant emissions would occur from operation of the automated people mover; rather, emissions would occur from off-airport utility plant operations necessary to support the additional electricity demand. The method for estimating these emissions is discussed below in Section 1.2.2.2.

On-Road Vehicles

All surface vehicles traveling to or from LAX were considered in the air quality analysis for the General Conformity Determination, including: privately-owned vehicles, government-owned vehicles, and commercially-owned vehicles, such as rental cars, shuttles, buses, taxicabs, and trucks. Temporal data that identifies the vehicle volumes by hour for traffic and on-airport parking was determined from the transportation analysis developed for the EA.

Assumptions to be used for these vehicles are:

- Emissions from passenger, employee, and cargo delivery trips were calculated using Los Angeles County average fleet emission factors per mile obtained from EMFAC2014.
- VMTs were obtained from the traffic analysis to be prepared as part of the LAX Landside Access Modernization Program EA.
- The emission factors were multiplied by the total annual forecast VMTs for the 2024, 2030, and 2035 Proposed Action and No Action conditions.

1.2.2.2 Stationary Sources

Stationary sources include fixed combustion equipment (e.g., small package plants and natural gas space heaters and water heaters) and incremental electricity demand. Both were analyzed in the General Conformity Determination.

It is anticipated that the LAX Landside Access Modernization Program electrical demand as well as heating and cooling demands would be provided by grid based power (such as from the Los Angeles Department of Water and Power). CalEEMod[4] was used to develop an emissions inventory, including emissions for small package plants, for new buildings assumed to be constructed on property used for construction laydown and staging areas during construction of the LAX Landside Access Modernization Program.

1.3 Dispersion Analysis

Dispersion is the process by which atmospheric pollutants disseminate due to wind and vertical instability. Air dispersion modeling is used to predict ground-level ambient air concentrations of pollutants in the vicinity of known air emission sources. The results of a dispersion analysis are used to assess pollutant concentrations at or near an airport. The base data for the dispersion analysis are the emissions inventories described in Section 1.2.2 above, meteorological data that define the wind speeds and direction in the vicinity of LAX, and air pollutant concentrations at monitoring locations where the ground level concentrations were calculated.

Air dispersion modeling was used to predict pollutant concentrations for operational sources for the 2024, 2030, and 2035 Proposed Action and No Action conditions. Predicted concentrations resulting from the LAX Landside Access Modernization Program were calculated for the following criteria pollutants: CO, NO_2, PM_{10}, $PM_{2.5}$, and SO_2. Incremental Proposed Action Alternative pollutant concentrations were added to background ambient concentrations and the resulting summations were compared to the NAAQS ambient air quality standards. Incremental Proposed Action Alternative pollutant concentrations were developed using incremental emissions of the Proposed Action Alternative minus the No Action Alternative for 2024, 2030, and 2035.

1.3.1 MODELS/ANALYSIS

Dispersion modeling of on-airport construction, mobile and stationary sources, and off-airport mobile emissions, was conducted using the most current EPA-approved American Meteorological Society (AMS)/EPA Regulatory Model (AERMOD) air dispersion model. Model inputs/assumptions include:

- The averaging periods selected in AERMOD for each pollutant are based on the South Coast Air Basin's attainment status and averaging periods in the NAAQS.

[4] California Air Pollution Control Officers Association, California Emissions Estimator Model (CalEEMod) Version 2013.2.2, prepared by ENVIRON International Corporation and the California Air Districts, available: http://www.caleemod.com/ (accessed on May 24, 2016).

- The equipment used on the construction site and staging areas and the equipment transfer and haul trucks were included in the dispersion modeling of all pollutants.
- The fugitive dust generated by these sources was included in the PM_{10} and $PM_{2.5}$ analyses.
- The Ozone Limiting Method (OLM) with 5 years of meteorological data (see below) and associated five years of hourly ozone data provided by SCAQMD was used to quantify NO_2 emissions from NO_x emissions.
- The meteorological data discussed in the following section was used for this analysis.

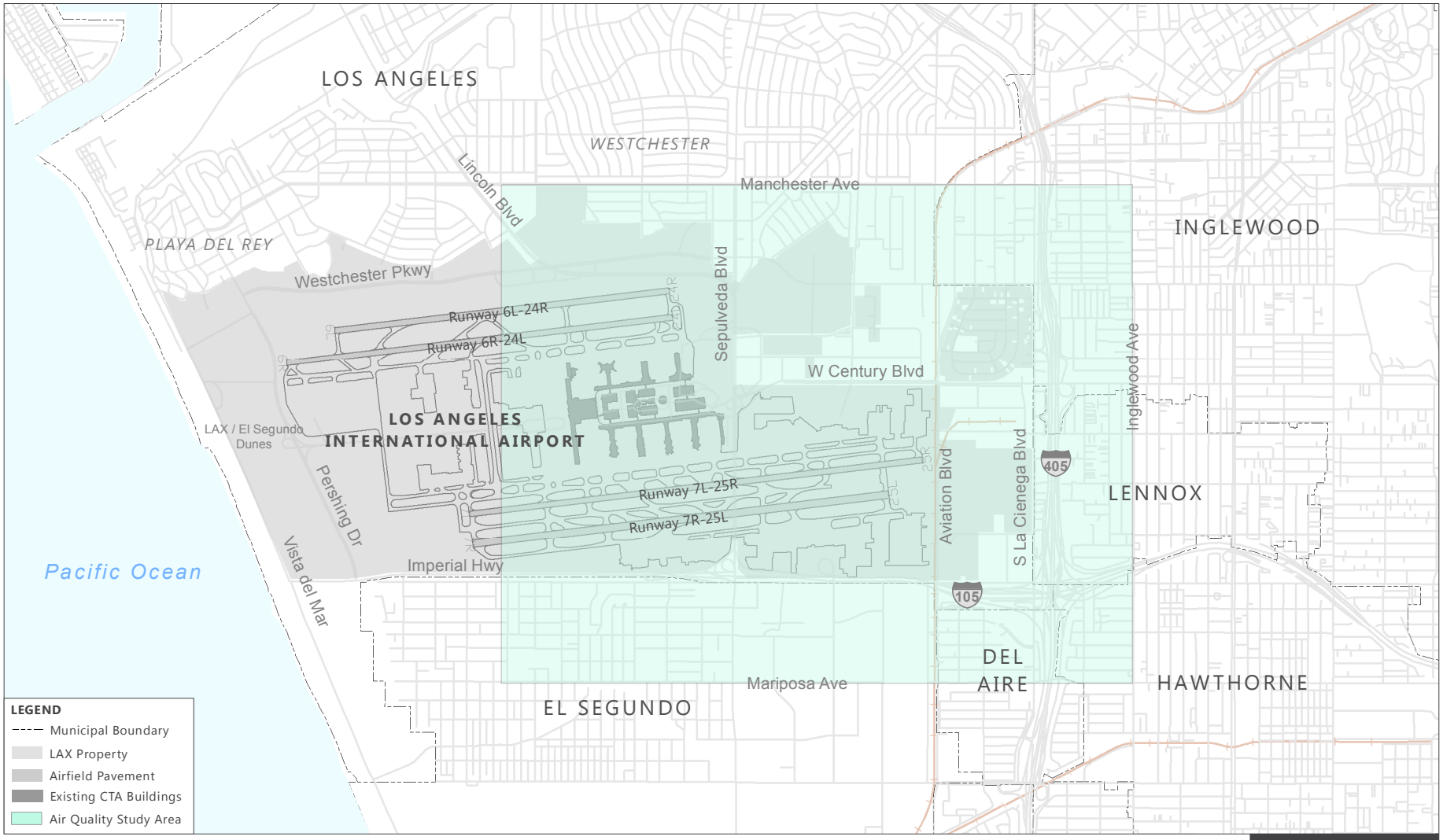
1.3.2 METEOROLOGY

Five years of the most recent site-specific National Weather Service (NWS) hourly surface data was used in the modeling to determine the meteorological conditions that would lead to peak concentrations (2015).[5] The meteorological data for the NWS LAX site is available from the National Oceanic and Atmospheric Administration (NOAA) National Centers for Environmental Information (NCEI), formerly the National Climatic Data Center website. This data was preprocessed along with Automated Surface Observing System (ASOS) 1-minute wind data using AERMET. AERMET is a meteorological preprocessor for organizing available meteorological data into a format suitable for use in the AERMOD air quality dispersion model. The dataset is comprised of hourly surface data collected at LAX for 2011 through 2015; the data includes ambient temperature, wind speed, wind direction, and atmospheric stability parameters, as well as mixing height parameters from the appropriate upper air station. The site-specific datasets were used to model pollutant concentrations for comparisons to the NAAQS.

1.3.3 SOURCE/RECEPTOR LOCATIONS

Receptor points are the geographic locations where the air dispersion model will calculate air pollutant concentrations. These receptor locations were placed in areas where the general public has unrestricted access near the Proposed Action. Receptors were placed at reasonable distances from the Proposed Action sources, outside of any fencing or other access restrictions. Modeled concentrations at these locations would therefore be higher than concentrations modeled farther away from the Proposed Action. Based on assessing the change in surface traffic volumes of the 183 intersections analyzed in the Traffic Study completed for the LAX Landside Access Modernization Program EIR, the air quality analysis completed for the CEQA process determined that emission increases with the Proposed Action were only occurring in a much limited area. Thus, LAWA completed the air quality analysis for the General Conformity Determination using the focused Study Area and 5 years of meteorological data. **Figure 1** identifies the Air Quality Study Area for the General Conformity analysis.

[5] In accordance with 40 CFR Appendix W to Part 51, July 1, 2011, available: http://www.gpo.gov/fdsys/granule/CFR-2011-title40-vol2/CFR-2011-title40-vol2-part51-appW (Accessed December 30, 2014).



SOURCES: Los Angeles County, 2010, 2011 (city boundary, streets); LAX Airport Layout Plan, Ricondo & Associates, Inc., 2010 (runways, taxiways, terminal area, ariport property boundary).
National Geographic World Map, ESRI Database, 2011.
PREPARED BY: Ricondo & Associates, Inc., May 2017.

FIGURE 1

Air Quality Study Area

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Up to 1,000 receptor locations at an assumed height of 0 meters (ground level) were used for this air quality impact analysis; including receptors located at off-airport locations near the Proposed Action Alternative. National Elevation Dataset (NED) files that cover the modeling domain were downloaded from the U.S. Geological Survey (USGS) website. These files were processed in AERMAP to provide terrain elevations for sources and receptors.

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Attachment B

SCAQMD Letter to LAWA (May 10, 2016)

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 10, 2016

Ms Lisa Trifiletti
Deputy Executive Director
Environmental Programs Group
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

Dear Ms. Trifiletti,

Thank you for meeting with South Coast Air Quality Management District (SCAQMD) staff and providing us with the anticipated construction emissions for NOx and VOC (dated May 3, 2016 and attached) for Phase I of the LAX Landside Access Modernization Program (LAMP) for general conformity purposes.

The conformity determination process is intended to demonstrate that a proposed Federal action will not: (1) cause or contribute to new violations of a national ambient air quality standard (NAAQS); (2) interfere with provisions in the applicable SIP for maintenance of any NAAQS; (3) increase the frequency or severity of existing violations of any standard; or (4) delay the timely attainment of any standard.

The South Coast Air Basin (Basin) is designated as extreme non-attainment for ozone and serious non-attainment for PM2.5. To streamline the review process and to facilitate conformity determinations for projects in the Basin, two separate VOC and NOx general conformity budgets were established in the Final 2012 AQMP: 1 tpd of NOx and 0.2 tpd of VOC were set aside for this purpose every year, starting in 2013 until 2030, from the projected emission growth in the Final 2012 AQMP. SCAQMD has set up a tracking system for projects requiring conformity determinations on a first come first serve basis, whereby the project emissions are debited from the applicable set aside accounts until they are depleted.

SCAQMD staff has reviewed the construction emissions submitted for the LAMP and determined that the NOx and VOC emissions from 2017 through 2023 can be accommodated within the General Conformity Budgets established in the Final 2012 AQMP. Therefore, the project will conform to the SIP and is not expected to result in any new or additional violations of the NAAQS or impede the projected attainment of the standards.

If you have any questions, please contact me at (909) 396-2239 or pfine@aqmd.gov.

Sincerely,

Philip M. Fine, Ph.D.
Deputy Executive Officer
Planning, Rule Development & Area Sources
South Coast Air Quality Management District

IM:JW
Attachment

cc: Tom Kelly, US EPA Region IX
Barbara Baird, SCAQMD
Henry Hogo, SCAQMD
Sang-Mi Lee, SCAQMD

Los Angeles
World Airports

TM

May 3, 2016

Dr. Philip Fine
Deputy Executive Officer
Planning, Rule Development and Area Source Division
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Subject: Los Angeles International Airport Landside Access Modernization Program Construction Emissions

Dear Dr. Fine:

Thank you for discussing the general conformity process under the approved 2012 Air Quality Management Plan (AQMP) with us last Friday, April 29, 2016.

Attached, please find summary tables of anticipated LAX Landside Access Modernization Program (LAMP) construction NOx and VOC emissions for Phase I of the LAMP (see Table 3). These annual estimates, in tons per year, assume that the fleet average emissions from off-road construction equipment will meet the Tier 3 NOx and VOC Standards, and the fleet average on-road haul and delivery trucks will achieve a 1.2 grams NOx per mile and 0.14 gram VOC per mile emission rates with 2007 and later model year vehicles. In addition, these estimates do not include emissions from those elements currently known to require a project-level transportation conformity determination by the Federal Highway Administration or Federal Transit Administration. Improvements to the I-405 on- and off-ramps at S. La Cienega Boulevard and the improvements associated with the I-105 and Aviation Boulevard exit ramps are not included in the attached calculations.

We respectfully request that AQMD determine that these emissions are included in the General Conformity Budgets identified in the Final 2012 AQMP (Appendix III, Chapter 2). Please contact me with any other questions at (424) 646-5186.

Sincerely,

Lisa Trifiletti
Deputy Executive Director
Environmental Programs Group

LT:dke

Attachment

cc: H. Hogo, South Coast AQMD
J. Wong, South Coast AQMD

ATTACHMENT

Table 1. Summary of LAX LAMP Construction NOx Emissions Subject to General Conformity

Emission Source	NOx Emissions, tons per year						
	2017	2018	2019	2020	2021	2022	2023
Off-Road, On-Site Equipment [a.]	56	94	105	124	82	37	30
On-Road, On-Site Trucks [b.]	8	18	21	16	11	7	6
On-Road, Off-Site Haul & Deliveries [b.]	16	45	59	51	22	15	13
On-Road, Off-Site Worker Trips	2	7	8	6	7	4	4
Total	**82**	**164**	**194**	**198**	**122**	**63**	**53**

a. Assumes the fleet average emissions from off-road construction equipment meets the Tier 3 NOx Standards.
b. Assumes the fleet average emissions from on-road trucks meets the phased-in 2007 model year NOx standard (~1.2 g/mile).

Table 2. Summary of LAX LAMP Construction VOC Emissions Subject to General Conformity

Emission Source	VOC Emissions, tons per year						
	2017	2018	2019	2020	2021	2022	2023
Off-Road, On-Site Equipment [a.]	3	5	6	7	4	2	2
On-Road, On-Site Trucks [b.]	2	8	13	18	16	10	9
On-Road, Off-Site Haul & Deliveries [b.]	1	2	3	3	1	1	1
On-Road, Off-Site Worker Trips	4	17	19	15	16	11	9
Total	**10**	**32**	**41**	**42**	**37**	**23**	**21**

a. Assumes the fleet average emissions from off-road construction equipment meets the Tier 3 VOC Standards.
b. Assumes the fleet average emissions from on-road trucks meets the phased-in 2007 model year VOC standard (0.14 g/mile).

Table 3. Phase 1 LAX LAMP Project Elements

• Automated People Mover (APM) System including guideway, 6 APM stations, maintenance and storage facility and APM power substations
• Consolidated Rental Car Facility
• Intermodal Transportation Facility West
• Intermodal Transportation Facility East
• Roadway Improvements o New 'A' Street (W. Century Boulevard to Westchester Parkway/W. Arbor Vitae Street) o New 'B' Street (New 'A' Street to Airport Boulevard) o W. 96th Street (Airport Boulevard to Bellanca Avenue) o New 'D' Street (W. 96th Street to W. Arbor Vitae Street) o W. Arbor Vitae Street (Airport Boulevard to S. La Cienega Boulevard) o Aviation Boulevard (W. Century Boulevard to W. Arbor Vitae Street) o S. La Cienega Boulevard (W. Century Boulevard to W. Arbor Vitae Street) o New W. 98th Street (Aviation Boulevard to S. La Cienega Boulevard) o Concourse Way (W. Century Boulevard to Arbor Vitae Street) o Southbound S. Sepulveda Boulevard to World Way (departures and arrivals) Ramp o Airport Boulevard (W. 98th Street to W. Arbor Vitae Street) o W. 98th Street (Airport Boulevard to Aviation Boulevard) o W. Century Boulevard (New 'A' Street to Aviation Boulevard)
• Various enabling projects including utility relocations

Appendix P

Public Involvement

Appendix P.1

Notice of Availability

NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL ASSESSMENT, DRAFT GENERAL CONFORMITY DETERMINATION, AND PUBLIC WORKSHOP

Pursuant to Title 40 Code of Federal Regulations 1506.6(b) notice is hereby given that the City of Los Angeles, California, through its airport department – Los Angeles World Airports (LAWA), that a Draft Environmental Assessment (Draft EA) and Draft General Conformity Determination has been prepared to evaluate the potential environmental impacts of a proposed Landside Access Modernization Program at Los Angeles International Airport (LAX), Los Angeles, Los Angeles County, California (Proposed Action). The purpose of the Proposed Action is to improve access options and the landside travel experience for passengers, enhance efficiency and alleviate delays on and congestion of on-Airport and surrounding roadways, shift the location of a portion of traffic from the Central Terminal Area (CTA) to locations outside the CTA and off the surrounding street network, provide a direct connection to the Metro rail and transit system, and improve connectivity and mobility for airport passengers, visitors, and employees between the regional ground transportation system and LAX.

The Proposed Action includes the following proposed improvements: (1) construction of an Automated People Mover (APM) system with six APM stations connecting the CTA via an above ground fixed guideway to new proposed buildings that will provide ground access to the airport; (2) passenger walkway systems connecting the APM stations to passenger terminals, parking garages, and ground transportation facilities; (3) modifications to existing passenger terminals and parking garages to support the APM walkway system connections, including vertical circulation cores to the arrival, departure, and concourse levels at the terminals; (4) an APM maintenance and storage facility (MSF) and APM power substations; (5) a Consolidated Rental Car facility (CONRAC) designed to meet the needs of car rental agencies serving LAX with access to the CTA via the APM; (6) two Intermodal Transportation Facilities (ITF) providing parking and pick-up and drop-off areas outside the CTA for private vehicles and commercial shuttles; (7) roadway improvements and project design features designed to improve access to the proposed facilities and the CTA and reduce traffic congestion in neighboring communities; (8) land acquisition for the APM right-of-way in various locations totaling about 26 acres; and (9) various enabling projects to allow construction of the Proposed Action, including utility relocation and demolition of certain existing facilities, some of which would be reconstructed.

The Draft EA evaluates the potential environmental effects of the Proposed Action described above and its alternatives, and has been prepared pursuant to the requirements of Section 102(2)(c) of the *National Environmental Policy Act of 1969* (NEPA), and Section 509(b)(5) of the *Airport and Airway Improvement Act of 1982*, as amended. The FAA is the lead federal agency to ensure compliance with NEPA for airport development actions. The Draft EA has also been prepared in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures*, and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*. The Draft EA includes an analysis of reasonable alternatives, potential environmental impacts, and mitigation measures, as appropriate. A draft Memorandum of Agreement (MOA) to mitigate adverse effects on historic properties is also included in the Draft EA for public review and comment. The Draft EA also includes a Draft General Conformity Determination for the proposed improvements associated with the Proposed Action.

PUBLIC REVIEW

Beginning on **Friday, August 18, 2017**, the Draft EA and Draft General Conformity Determination will be available for public review through **Tuesday, September 26, 2017** at the following locations:

Online	www.ourlax.org www.connectinglax.com
Federal Aviation Administration, Western-Pacific Region, Los Angeles Airports District Office	15000 Aviation Boulevard, Lawndale, CA 90261
LAWA Administrative Offices	One World Way, Room 218, Los Angeles, CA 90045
Public Libraries	• Westchester-Loyola Village Branch Library, 7114 W. Manchester Avenue, Los Angeles, CA 90045 • Dr. Mary McLeod Bethune Regional Branch Library, 3900 S. Western Avenue, Los Angeles, CA 90062 • El Segundo Library, 111 W. Mariposa Avenue, El Segundo, CA 90245 • Hawthorne Library, 12700 Grevillea Avenue, Hawthorne, CA 90250 • Inglewood Library, 101 W. Manchester Boulevard, Inglewood, CA 90301 • Culver City Library, 4975 Overland Avenue, Culver City, CA 90230

PUBLIC WORKSHOP

A Public Workshop on the Draft EA and Draft General Conformity Determination will be held on **Tuesday, September 19, 2017** from 5:00 p.m. to 8:00 p.m., Pacific Daylight Time at the **Flight Path Learning Center, 6661 West Imperial Highway, Los Angeles, California, 90045**.

PUBLIC COMMENTS

Comments must be received by **5:00 p.m. Pacific Daylight Time** on **Tuesday, September 26, 2017**. Please ensure adequate time for mailing. Comments can only be accepted with the full name and address of the individual commenting.

Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment – including your personal identifying information – may be made publicly available at any time. While you can ask the FAA in your comment to withhold from public review your personal identifying information, the FAA cannot guarantee that it will be able to do so. Comments received on the Draft EA and Draft General

Conformity Determination and the responses to those comments will be disclosed in the Final EA and Final General Conformity Determination, respectively.

Written comments on the adequacy of the information disclosed in the Draft EA and Draft General Conformity Determination may be submitted by 5:00 p.m. Pacific Daylight Time on Tuesday, September 26, 2017, online at http://www.lawa.org/ourLAX/Comments.aspx or by mail to:

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

Sign Language Interpreters, Communication Access Real-Time Transcription, Assistive Listening Devices, or other auxiliary aids and/or services may be provided upon request. To ensure availability, you are advised to make your request at least 72 hours prior to the meeting you wish to attend. Due to difficulties in securing Sign Language Interpreters, five or more business days' notice is strongly recommended. 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, visite www.OurLAX.org o llame a (800) 919-3766.

Appendix P.2

Local Publication

Proofs of Newspaper Publications

Library Receipts

Los Angeles Times
MEDIA GROUP

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

STATE OF ILLINOIS
County of Cook

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):

Aug 18, 2017

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 Chicago, Illinois
on this 18 day of 8, 2017.

[signature]

435 N. Michigan Ave.
Chicago, IL 60611

Los Angeles Times
MEDIA GROUP

Sold To:
Ricondo & Associates - CU00542081
20 Frederica Oaks Ln
Saint Simons Island,GA 31522-1974

Bill To:
Ricondo & Associates - CU00542081
20 Frederica Oaks Ln
Saint Simons Island,GA 31522-1974

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Evelyn Y. Quintanilla
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21250 Hawthorne Blvd, Ste 170
Torrance, CA 90503-4077
310-543-6635
Fax: 310-316-6827

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ATLANTA, GA 30337

Account Number: 5173517

Ad Order Number: 0010996300

Customer's Reference / PO Number: Virginia Jackson / DB 8-52

Publication: Daily Breeze

Publication Dates: 08/18/2017

Amount: $859.95

Payment Amount: $859.95 *Payment Method:* Credit Card

Invoice Text: **DB 8-52**

NOTICE OF AVAILABILITY OF DRAFT ENVIRONMENTAL ASSESSMENT, DRAFT GENERAL CONFORMITY DETERMINATION, AND PUBLIC WORKSHOP

Pursuant to Title 40 Code of Federal Regulations 1506.6(b) notice is hereby given that the City of Los Angeles, California, through its airport department Los Angeles World Airports (LAWA), that a Draft Environmental Assessment (Draft EA) and Draft General Conformity Determination has been prepared to evaluate the potential environmental impacts of a proposed Landside Access Modernization Program at Los Angeles International Airport (LAX), Los Angeles, Los Angeles County, California (Proposed Action). The purpose of the Proposed Action is to improve access options and the landside travel experience for passengers, enhance efficiency and alleviate delays on and congestion of on-Airport and surrounding roadways, shift the location of a portion of traffic from the Central Terminal Area (CTA) to locations outside the CTA and off the surrounding street network, provide a direct connection to the Metro rail and transit system, and improve connectivity and mobility for airport passengers, visitors, and employees between the regional ground transportation system and LAX.

The Proposed Action includes the following proposed improvements: (1) construction of an Automated People Mover (APM) system with six APM stations connecting the CTA via an above ground fixed guideway to new proposed buildings that will provide ground access to the airport; (2) passenger walkway systems connecting the APM stations to passenger terminals, parking garages, and ground transportation facilities; (3) modifications to existing passenger terminals and parking garages to support the APM walkway system connections, including vertical circulation cores to the arrival, departure, and concourse levels at the terminals; (4) an APM maintenance and storage facility (MSF) and APM power substations; (5) a Consolidated Rental Car facility (CONRAC) designed to meet the needs of car rental agencies serving LAX with access to the CTA via the APM; (6) two Intermodal Transportation Facilities (ITF) providing parking and pick-up and drop-off areas outside the CTA for private vehicles and commercial shuttles; (7) roadway improvements and project design features designed to improve access to the proposed facilities and the CTA and reduce traffic congestion in neighboring communities; (8) land acquisition for the APM right-of-way in various locations totaling about 26 acres; and (9) various enabling projects to allow construction of the Proposed Action, including utility relocation and demolition of certain existing facilities, some of which would be reconstructed.

The Draft EA evaluates the potential environmental effects of the Proposed Action described above and its alternatives, and has been prepared pursuant to the requirements of Section 102(2)(c) of the National Environmental Policy Act of 1969 (NEPA), and Section 509(b)(5) of the Airport and Airway Improvement Act of 1982, as amended. The FAA is the lead federal agency to ensure compliance with NEPA for airport development actions. The Draft EA has also been prepared in accordance with FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, and FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions. The Draft EA includes an analysis of reasonable alternatives, potential environmental impacts, and mitigation measures, as appropriate. A draft Memorandum of Agreement (MOA) to mitigate adverse effects on historic properties is also included in the Draft EA for public review and comment. The Draft EA also includes a Draft General Conformity Determination for the proposed improvements associated with the Proposed Action.

PUBLIC REVIEW

Beginning on **Friday, August 18, 2017,** the Draft EA and Draft General Conformity Determination will be available for public review through **Tuesday, September 26, 2017** at the following locations:

Online www.ourlax.org
www.connectinglax.com

Federal Aviation
Administration,
Western-Pacific Region,
Los Angeles Airports
District Office 15000 Aviation Boulevard, Lawndale, CA 90261

LAWA Administrative
Offices One World Way, Room 218, Los Angeles, CA 90045

Public Libraries

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

 Dr. Mary McLeod Bethune Regional Branch Library, 3900 S. Western Avenue, Los Angeles, CA 90062

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

 Hawthorne Library, 12700 Grevillea Avenue, Hawthorne, CA 90250

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

□ Culver City Library, 4975 Overland Avenue, Culver City, CA 90230

PUBLIC WORKSHOP

A Public Workshop on the Draft EA and Draft General Conformity Determination will be held on **Tuesday, September 19, 2017** from 5:00 p.m. to 8:00 p.m., Pacific Daylight Time at the **Flight Path Learning Center, 6661 West Imperial Highway, Los Angeles, California, 90045.**

PUBLIC COMMENTS

Comments must be received by **5:00 p.m. Pacific Daylight Time on Tuesday, September 26, 2017.** Please ensure adequate time for mailing. Comments can only be accepted with the full name and address of the individual commenting.

Before including your address, phone number, email address, or other personal identifying information in your comment, be advised that your entire comment □ including your personal identifying information □ may be made publicly available at any time. While you can ask the FAA in your comment to withhold from public review your personal identifying information, the FAA cannot guarantee that it will be able to do so. Comments received on the Draft EA and Draft General Conformity Determination and the responses to those comments will be disclosed in the Final EA and Final General Conformity Determination, respectively.

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

Sign Language Interpreters, Communication Access Real-Time Transcription, Assistive Listening Devices, or other auxiliary aids and/or services may be provided upon request. To ensure availability, you are advised to make your request at least 72 hours prior to the meeting you wish to attend. Due to difficulties in securing Sign Language Interpreters, five or more business days' notice is strongly recommended. 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, visite www.OurLAX.org o llame a (800) 919-3766.

Published: August 18, 2017

Daily Breeze
21250 Hawthorne Blvd, Ste 170
Torrance, CA 90503-4077
310-543-6635
Fax: 310-316-6827

(Space below for use of County Clerk Only)

5173517

Legal No. **0010996300**

RICONDO & ASSOCIATES INC.
2077 CONVENTION CENTER CONCOURSE, SUITE 285
ATLANTA, GA 30337

FILE NO. DB 8-52

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:

08/18/2017

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

Dated at Torrance, California
On this 21th day of August, 2017.

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

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Public Libraries

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

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Published: August 18, 2017

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 resider
of the County aforesaid; I am over the age c
eighteen years, and not a party to or intereste
in the above-entitled matter. I am the princip
clerk of the printer of The Argonaut, a newspape
of general circulation, printed and publishe
weekly in the County of Los Angeles, State
California, under the date of March 7, 197
modified October 5, 1976, Case Numb
C47170; that the notice, of which the annexed
a printed copy (set in type not smaller tha
nonpareil), has been published in each regul
and entire issue of said newspaper and not
any supplement thereof on the following date
to-wit:

8/17

All in the year 2017

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

Dated at 8/17

California, Los Angeles

Signature:

Chantal Marselis

Chantal Marselis

The Argonaut
Local News & Culture.

Located at:
5301 Beethoven St. Suite 183
Los Angeles, CA 90066

NOTICE OF AVAILABILITY OF AN ENVIRONMENTAL IMPACT REPORT AND PUBLIC MEETINGS

The City of Los Angeles, LA Sanitation – Watershed Protection Division, as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared a Draft Environmental Impact Report (EIR) for the proposed **Ballona Creek Bacteria Total Maximum Daily Load (TMDL) Project** (Project). The Project entails the development of three stormwater quality treatment facilities in the Cities of Culver City and Los Angeles that will reduce bacteria levels in Ballona Creek and Estuary and provide a new source of water for potential beneficial reuse to offset potable water demands. Please visit **www.LAStormwater.org** for project details and to view an electronic copy of the Draft EIR. Additionally, hard copies of the Draft EIR are available at the following locations:

Council District 11 Field Office Westchester Municipal Building 7166 West Manchester Blvd. Westchester, CA 90045 (310) 568-8772	City Clerk City of Culver City 9770 Culver Blvd. Culver City, CA 90232 (310) 253-5851	Playa Vista Library 6400 Playa Vista Dr. Los Angeles, CA 90094 (310) 437-6680
Culver City Senior Center 4095 Overland Ave. Culver City, CA, 90232 (310) 253-6700	Westchester Loyola Village Library 7114 West Manchester Ave. Los Angeles, CA 90045 (310) 348-1096	Westchester Senior Center 8740 Lincoln Blvd. Los Angeles, CA 90045 (310) 649-3317
Culver City Julian Dixon Library 4975 Overland Ave. Culver City, CA 90230 (310) 559-1676	Office of the City Clerk City of Los Angeles 200 N Spring St., Room 3951 Los Angeles, CA 90012 (213) 978-1020	Regulatory Affairs Division Bureau of Sanitation 1149 South Broadway St., 10th Floor Los Angeles, CA 90025 (213) 847-5174

LA Sanitation is requesting comments on the Draft EIR. Please email a comment from August 17 to October 2, 2017 to **lastormwater@lacity.org** or mail a comment to Mr. Hubertus Cox; LA Sanitation-Watershed Protection Division; 1149 S. Broadway, 10th Floor, Los Angeles, CA 90015, **no later than 5:00 p.m. on October 2, 2017.**

Public meetings will also be held on **September 20th from 1:00-3:00pm and 6:00-8:00pm** at the Westchester Municipal Building (7166 Manchester Avenue, Westchester, CA*). The purpose of the meetings is to answer questions on the Project and environmental analysis to assist in developing comments on the Draft EIR.

*As a covered entity under Title II of the American with Disabilities Act, the City of Los Angeles does not discriminate. The meeting facility and its parking are wheelchair accessible. Sign language interpreters, assistive listening devices, or other auxiliary aides and/or services may be provided upon request. Other services, such as translation between English and other languages, may also be provided upon request. To ensure availability of services, please make your request no later than 5:00 p.m. on Friday, September 15, 2017 by calling Wendy Dinh at (213) 485-3912.

LAX
Los Angeles
World Airports
TM

Environmental Programs Group

Receipt of Delivery

PROJECT: **Los Angeles International Airport (LAX) Landside Access Modernization Program**

DOCUMENTS ATTACHED:

- **Draft Environmental Assessment**

DELIVER TO:

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

Documents delivered on : 8/18/17

Received by: _____

LAX
Los Angeles
World Airports
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Environmental Programs Group

Receipt of Delivery

PROJECT: **Los Angeles International Airport (LAX) Landside Access Modernization Program**

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- **Draft Environmental Assessment**

DELIVER TO:

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

Documents delivered on : Friday, August 18, 2017

Received by: Rita M. Romero

LAX
Los Angeles
World Airports
™

Environmental Programs Group

Receipt of Delivery

PROJECT: **Los Angeles International Airport (LAX) Landside Access Modernization Program**

DOCUMENTS ATTACHED:

- **Draft Environmental Assessment**

DELIVER TO:

Dr. Mary McLeod Bethune Regional Branch Library
Senior Librarian
3900 S. Western Avenue
Los Angeles, CA, 90062

Documents delivered on :_____

Received by: Sandra J. Brooks 8/18/2017

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World Airports
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Environmental Programs Group

Receipt of Delivery

PROJECT: **Los Angeles International Airport (LAX) Landside Access Modernization Program**

DOCUMENTS ATTACHED:

- **Draft Environmental Assessment**

DELIVER TO:

Culver City Library
Senior Librarian
4975 Overland Avenue
Culver City, CA, 90230

Documents delivered on : 8-18-2017

Received by: _____

Lena Fakes

LAX
Los Angeles
World Airports
TM

Environmental Programs Group

Receipt of Delivery

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DOCUMENTS ATTACHED:

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DELIVER TO:

Hawthorne Library
Senior Librarian
12700 Grevillea Avenue
Hawthorne, CA, 90250

Documents delivered on : 8-18-17

Received by: _____

LAX
Los Angeles
World Airports
TM

Environmental Programs Group

Receipt of Delivery

PROJECT: **Los Angeles International Airport (LAX) Landside Access Modernization Program**

DOCUMENTS ATTACHED:

- **Draft Environmental Assessment**

DELIVER TO:

Inglewood Library
Senior Librarian
101 W. Manchester Blvd.
Inglewood, CA, 90301

Documents delivered on : 8/22/2017

Received by: _____

Appendix P.3

Public Workshop

Project Fact Sheet

Public Workshop Boards

Sign-in Sheets

LAMP

Los Angeles World Airports

LAX Landside Access Modernization Program (LAMP)

GET INVOLVED

LAX has initiated a comprehensive public involvement effort for the Landside Access Modernization Program (LAMP), designed to communicate information about the Project and provide opportunities for community input. For more information and to get involved, please visit **www.connectinglax.com**.

- **Participate in public meetings.** Notices of upcoming meetings will be posted at **www.connectinglax.com**.
- **Provide written comments.** You are encouraged to provide public comments on the project and the draft environmental documents at public meetings. Draft documents will be posted on the Project website at **www.connectinglax.com**, with instructions on how to submit comments.
- **Request a presentation.** LAWA is available to present at your neighborhood association or civic group. To schedule a presentation, contact (800) 919-3766 or lax-lamp@lawa.org.
- **Stay informed.** Get the latest updates by subscribing to the project mailing list at **www.connectinglax.com**.

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 more information, visit **www.connectinglax.com**

LAMP

LAX Landside Access Modernization Program (LAMP)

FACT SHEET

The Los Angeles International Airport (LAX) is the 2nd busiest airport in the United States and is the largest airport in California. To best meet the changing needs of travelers, employees, and residents, LAX is in the midst of a multi-billion dollar modernization program. The Landside Access Modernization Program (LAMP) will improve the LAX passenger experience, relieve congestion, and enhance LAX's status as a world-class airport.

LAMP consists of four primary components:

AUTOMATED PEOPLE MOVER SYSTEM

Elevated train connecting passengers to airline terminals via six stations

CONSOLIDATED RENTAL CAR FACILITY

Consolidate rental car agencies in one location

INTERMODAL TRANSPORTATION FACILITIES

New offsite passenger pick-up and drop off locations, including new parking facilities served by the Automated People Mover

TRAFFIC & ROADWAY IMPROVEMENTS

Alleviate traffic congestion in and around the airport facilities

PROGRAM GOALS & BENEFITS

RELIEVE TRAFFIC CONGESTION

Relieve traffic congestion in the Central Terminal Area and on the surrounding streets

CONVENIENT PASSENGER PICK-UP AND DROP-OFF

Improve access by creating new convenient locations for passenger pick-up, drop-off, and parking outside of the Central Terminal Area

FAST, RELIABLE ACCESS TO TERMINALS

Provide more efficient options to access the terminals, including easier access to rental cars and a direct connection to Metro's proposed Airport Metro Connector Station, which connects to the regional transit system

REDUCE VEHICLE EMISSIONS AND IMPROVE AIR QUALITY

Improving access options and relieving congestion will help improve air quality and reduce vehicle emissions

Anticipated Process and Schedule

The Landside Access Modernization Program (LAMP) requires federal and local approval as part of the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA) process.

CEQA: FINAL EIR CERTIFIED

- March 2017 — Board of Airport Commissioners Approved
- June 2017 — Los Angeles City Council Approved

NEPA

- August 2017 — Draft Environmental Assessment (EA) Release
- First Quarter 2018 — Final EA Release and Approval

CONSTRUCTION

- First Quarter 2018 — Estimated Construction Start (utilities and enabling work)
- 2024 — Estimated Construction Completion

LAMP PROJECT FEATURES

Automated People Mover System

The Automated People Mover will be an above ground airport transport system connecting LAX passengers to airline terminals, a new centralized rental car facility, remote pick-up and drop-off locations with airport parking facilities, and Metro's regional transit system. The Automated People Mover features include:

- Above ground system, 2¼ miles in length
- 6 stations connecting passengers to key LAX locations
- Free, convenient, & reliable 24-hour access to the Central Terminal Area

Consolidated Rental Car Facility

Currently, the rental car agencies are located in 23 different properties in the vicinity of LAX. The Consolidated Rental Car Facility will be designed to accommodate rental car agencies in one conveniently centralized location. Consolidated Rental Car Facility features include:

- Access to a variety of rental car options in one centralized location
- Direct access to airline terminals via the Automated People Mover
- Reduced congestion by eliminating rental car shuttles currently operating in the Central Terminal Area & on local roadways

Intermodal Transportation Facilities

The Intermodal Transportation Facilities (ITF) will offer facilities close to the 405 freeway and Sepulveda Boulevard to allow for convenient access options to the Central Terminal Area. Features include:

- Direct access to the airline terminals via the Automated People Mover System
- Boarding passes, information kiosks, & other amenities
- Access to shuttles & other transit
- Convenient pick-up and drop-off
- Public parking
- Connection to the proposed Airport Metro Connector Station (ITF East)

Roadway Improvements

Proposed roadway improvements are designed to reduce congestion and enable passengers to access LAX more efficiently. Improvement features include:

- Improved access in/out of the Central Terminal Area and the regional freeway system
- Additional traffic lanes & improved freeway ramps
- Bicycle & pedestrian improvements

Metro Transit Connection

The Automated People Mover will allow for a seamless connection to Metro's regional rail and bus system via the proposed Airport Metro Connector Station located at 96th Street/Aviation Boulevard. The Airport Metro Connector Station is being planned by Metro as an independent project, separate from LAMP. The transit station features include:

- Light rail station served by the Crenshaw/LAX & Metro Green Lines
- A new bus plaza for Metro & municipal buses
- Pedestrian & bicycle amenities
- Connection to the Automated People Mover over the station

LAX Sustainability and Design

- The Project will be designed to promote sustainability and reduce environmental impacts
- Sustainability features include energy efficient design, water efficiency and conservation, construction waste reduction and recycling, air quality emissions reduction measures, and natural resource protections.
- The design of the project will complement the architectural elements of the Theme Building, LAX Gateway lights, and other key airport facilities.

Welcome

PUBLIC WORKSHOP

LAX Landside Access Modernization Program
Draft Environmental Assessment
and Draft General Conformity Determination

Tuesday, September 19, 2017

5:00 p.m. to 8:00 p.m.

Flight Path Learning Center Museum
6661 W. Imperial Highway
Los Angeles, CA 90045

Los Angeles International Airport (LAX)

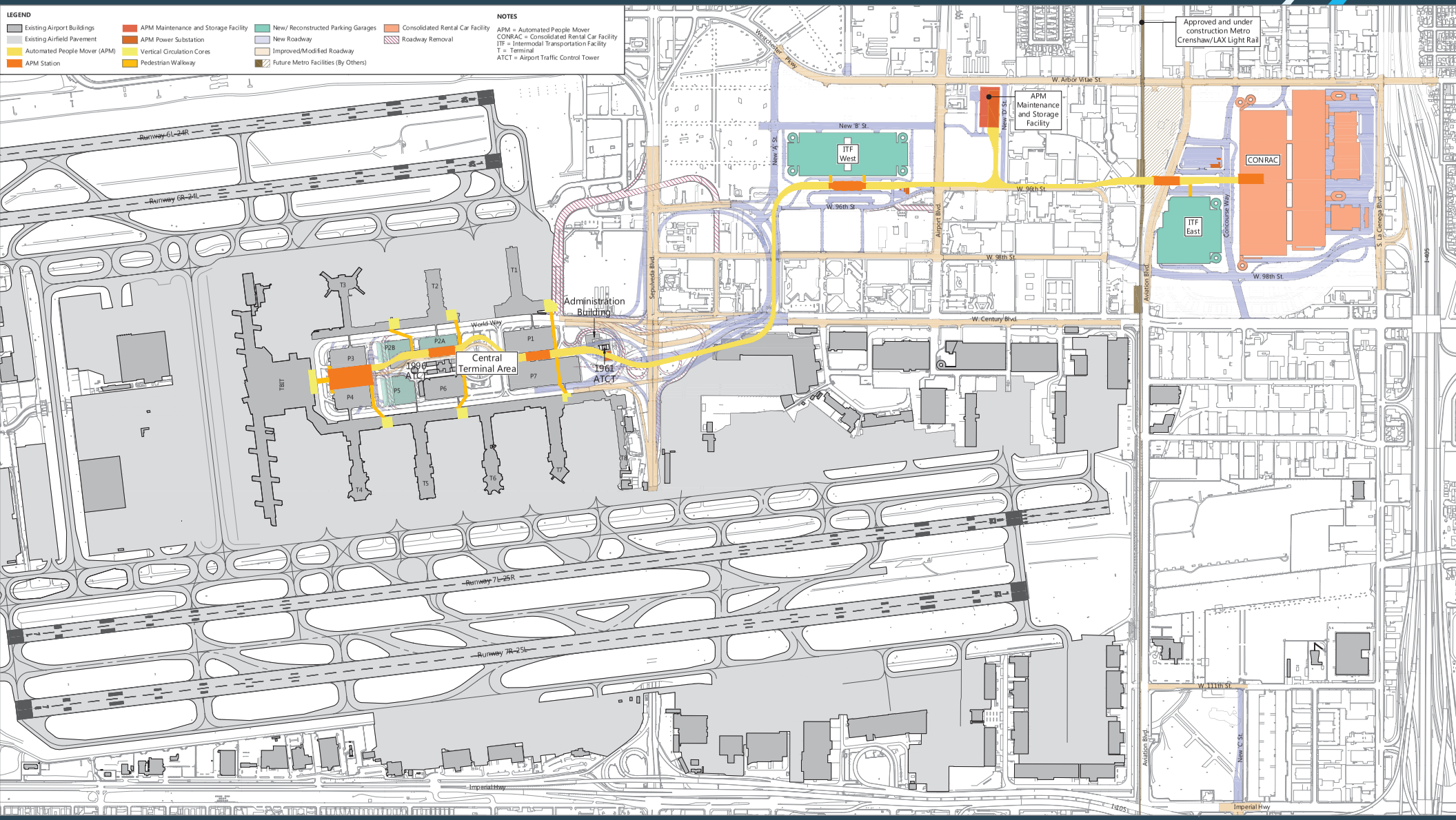
LAX – 1960's

LAX – Today

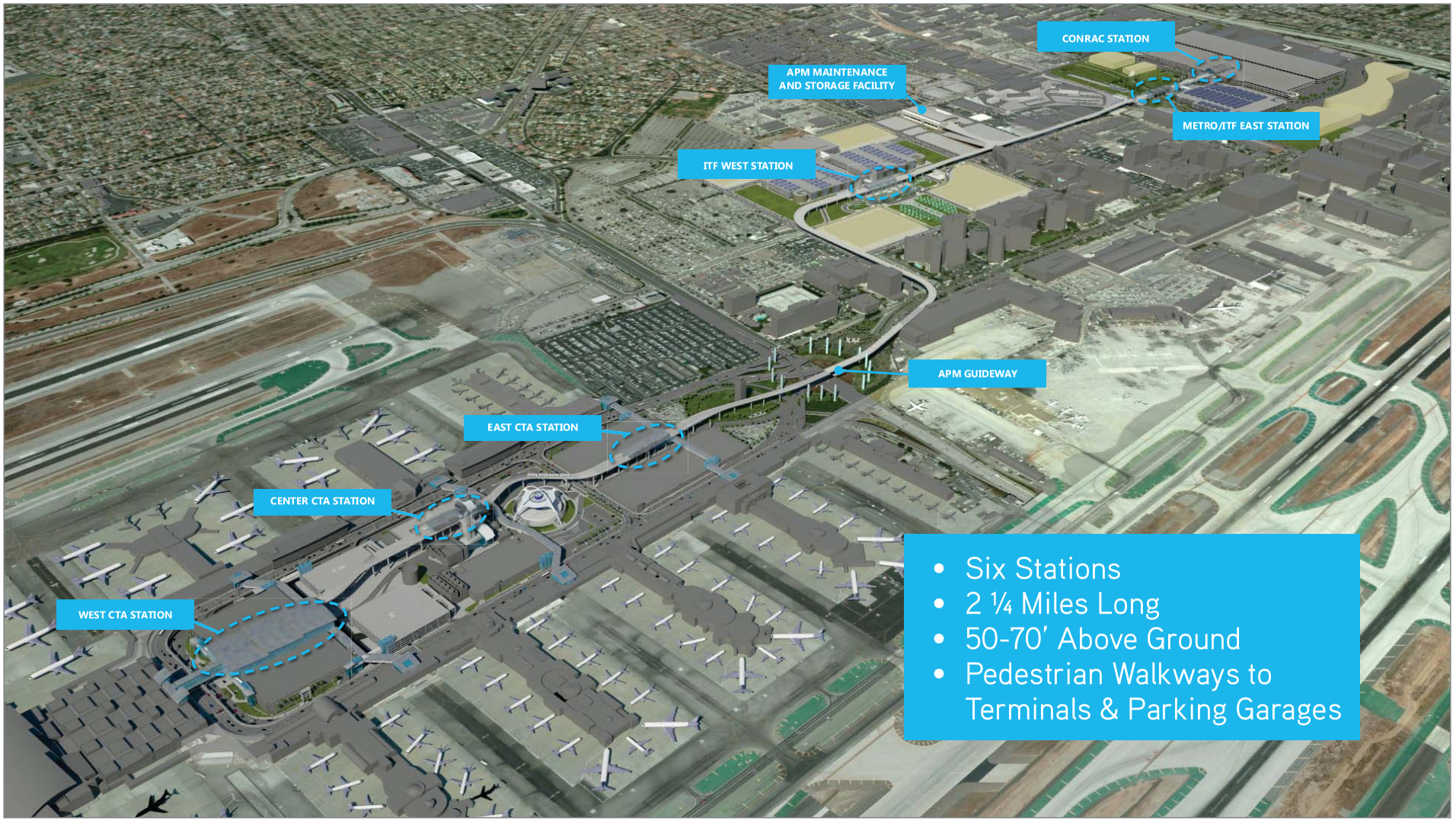
LAX – Today

- LAX is the largest commercial service airport in Southern California
- 2nd busiest airport in the United States with approximately 80.9 million passengers in 2016
- One of the world's busiest origin and destination airport
- Over 6,000 vehicles an hour enter LAX during peak periods

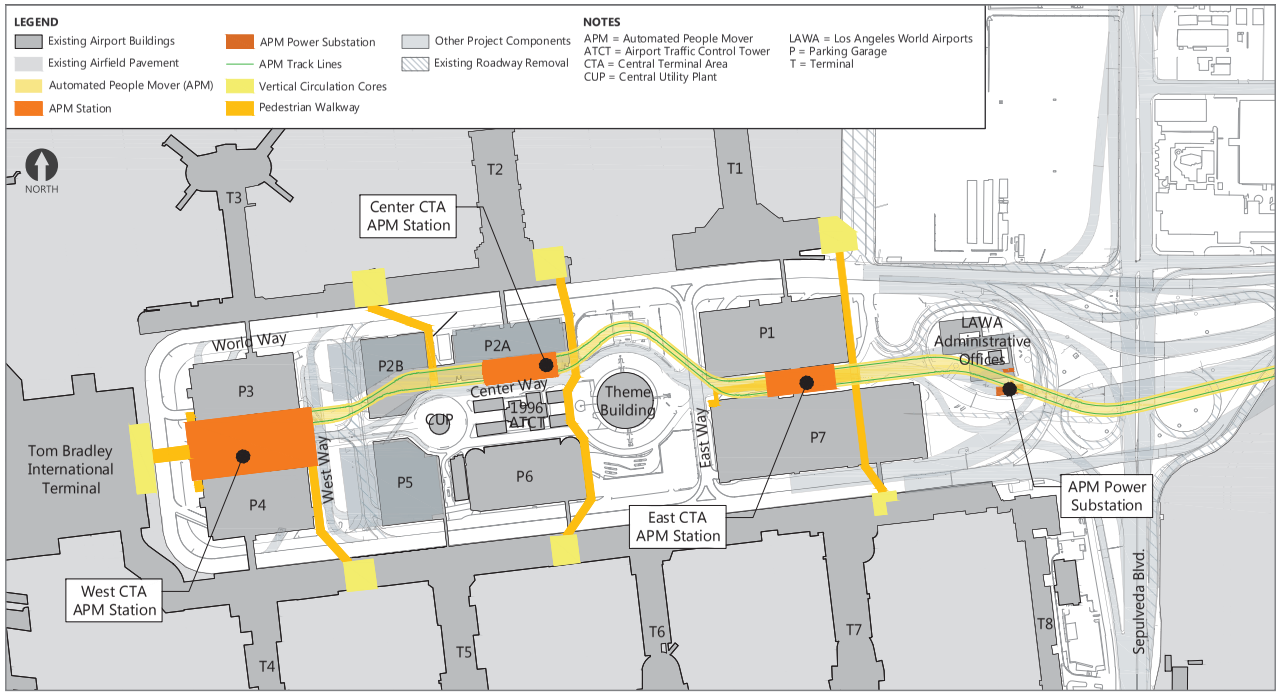
Project Overview



Automated People Mover (APM)

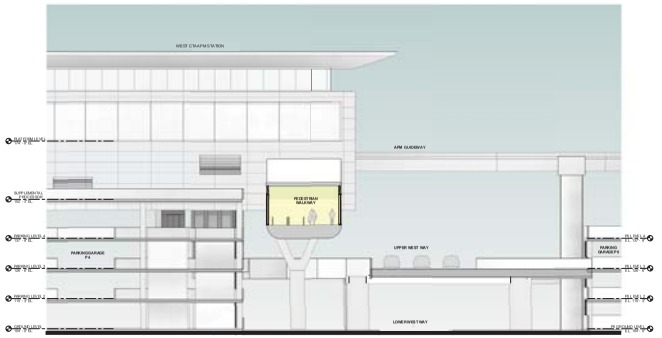


Central Terminal Area

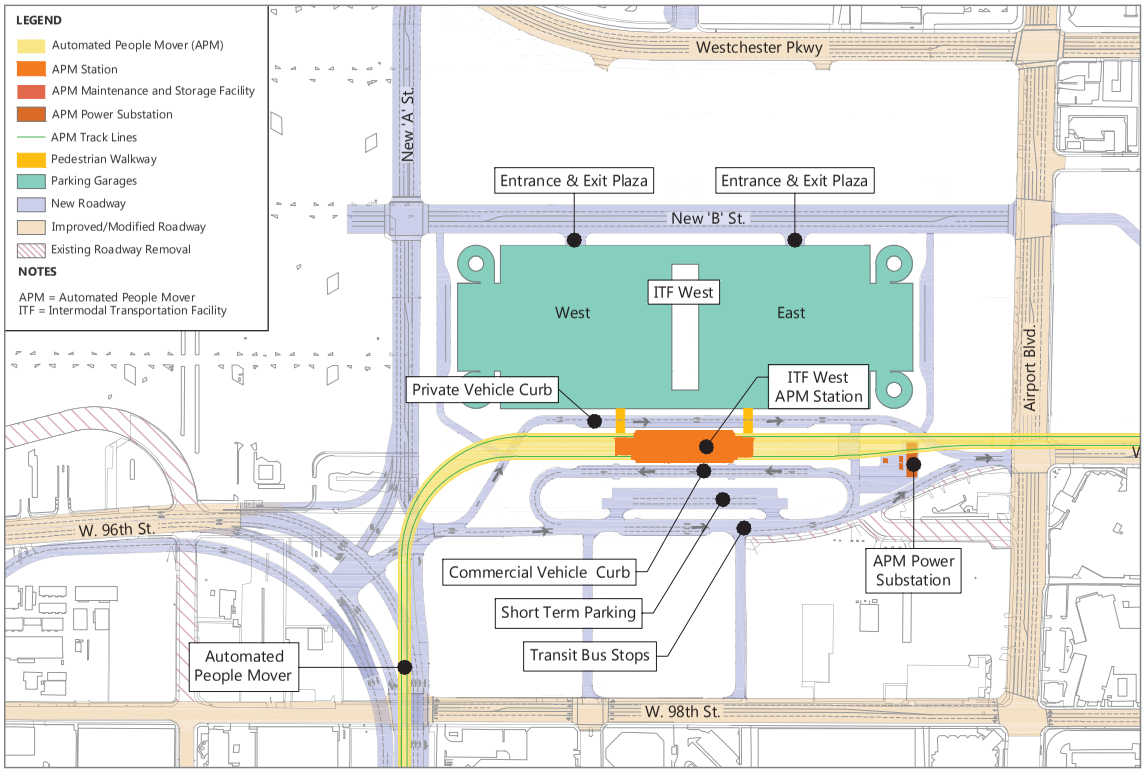


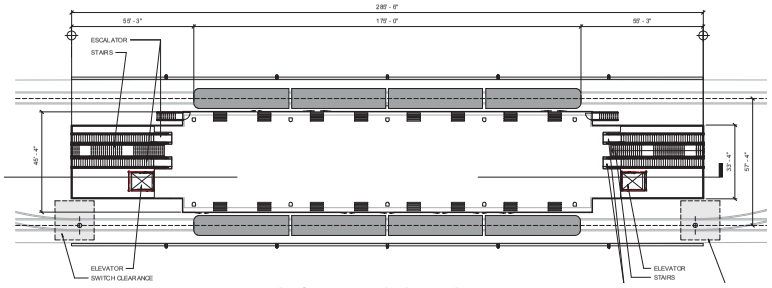
Three stations serving all terminals with pedestrian walkways:

- West CTA APM Station – TBIT, T4, T5
- Center CTA APM Station – T2, T3, T6
- East CTA APM Station – T1, T7, T8
- Approximately 70 feet above grade

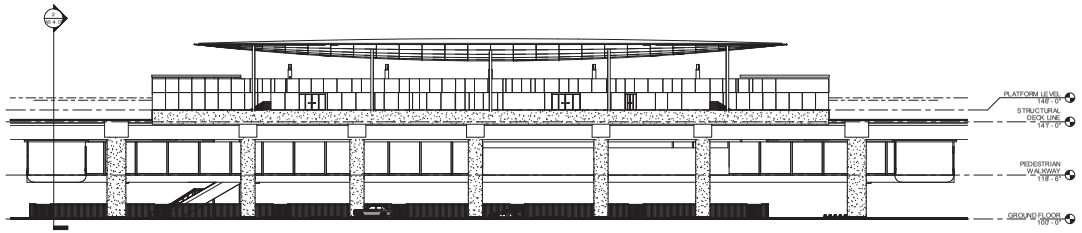


Intermodal Transportation Facility West





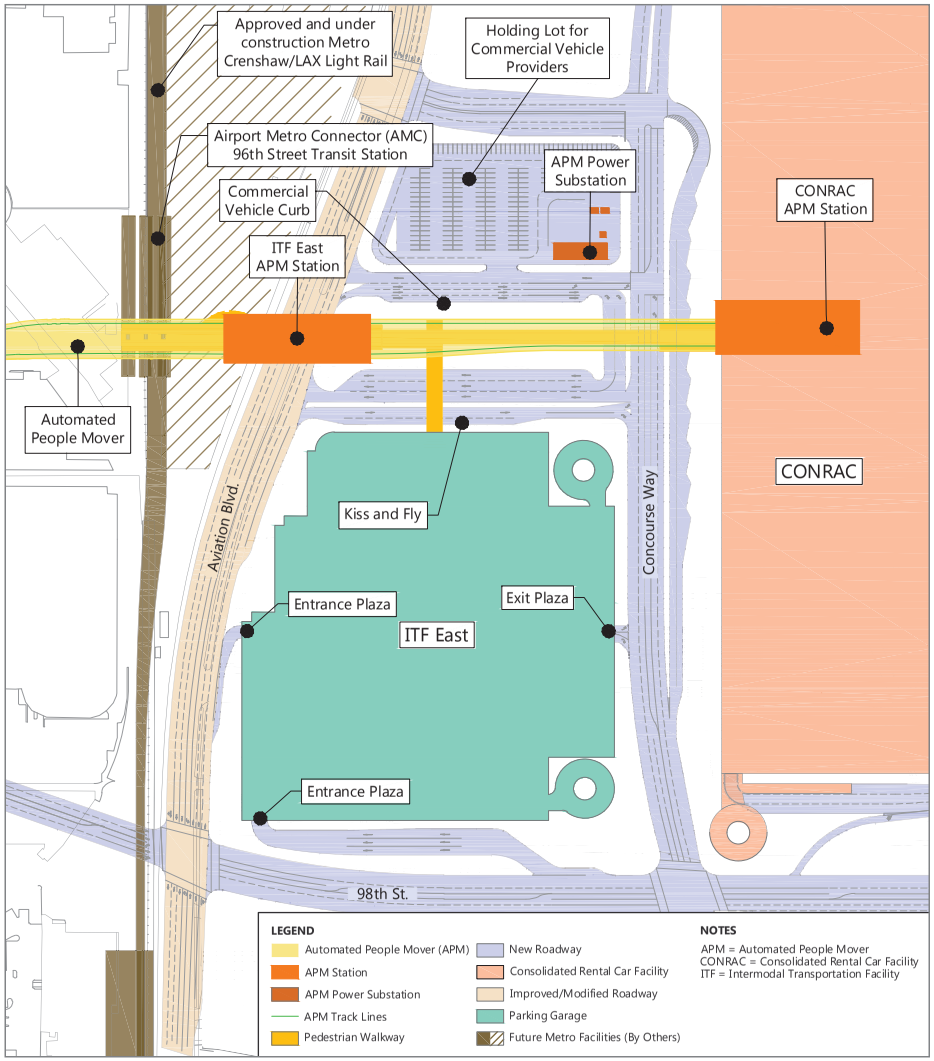
Platform Level Floor Plan

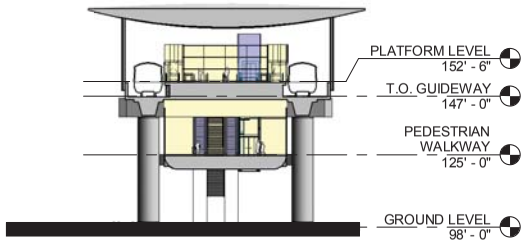


North View

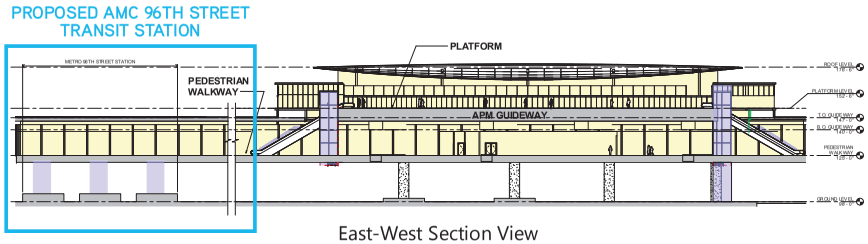
- ITF West APM Station
- Parking Garage with up to 8,000 spaces
- Commercial vehicle curb

Intermodal Transportation Facility East





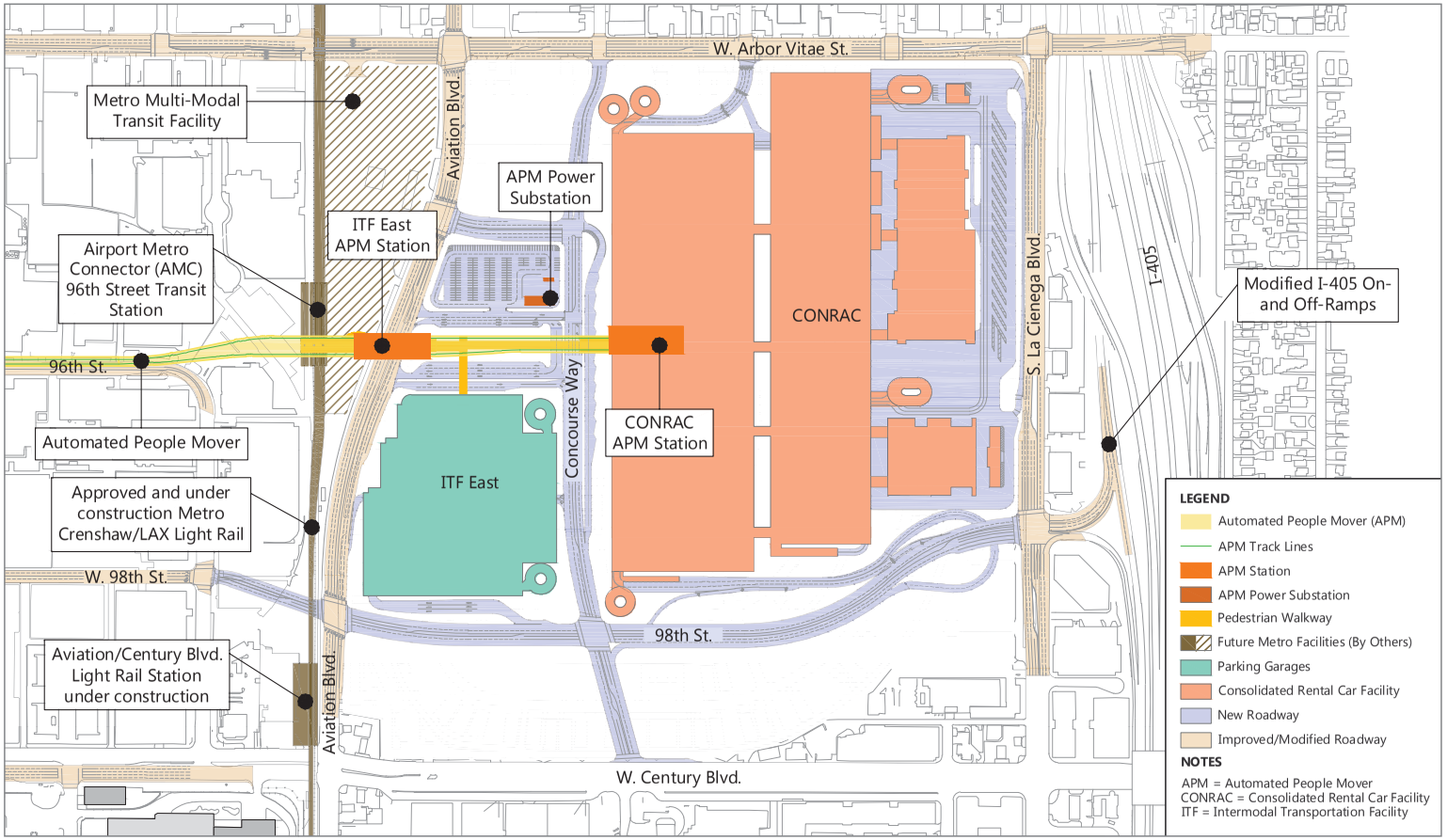
North-South Section View

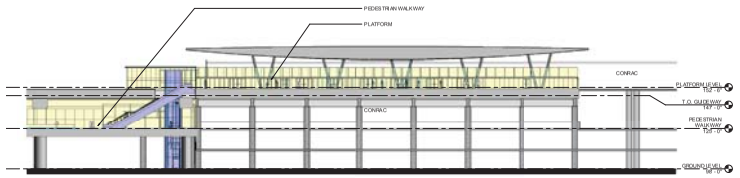


East-West Section View

- ITF East APM Station
- Connection to Metro AMC 96th Street Transit Station
- Parking Garage with up to 8,000 spaces
- Commercial vehicle curb

Consolidated Rental Car Facility (CONRAC)



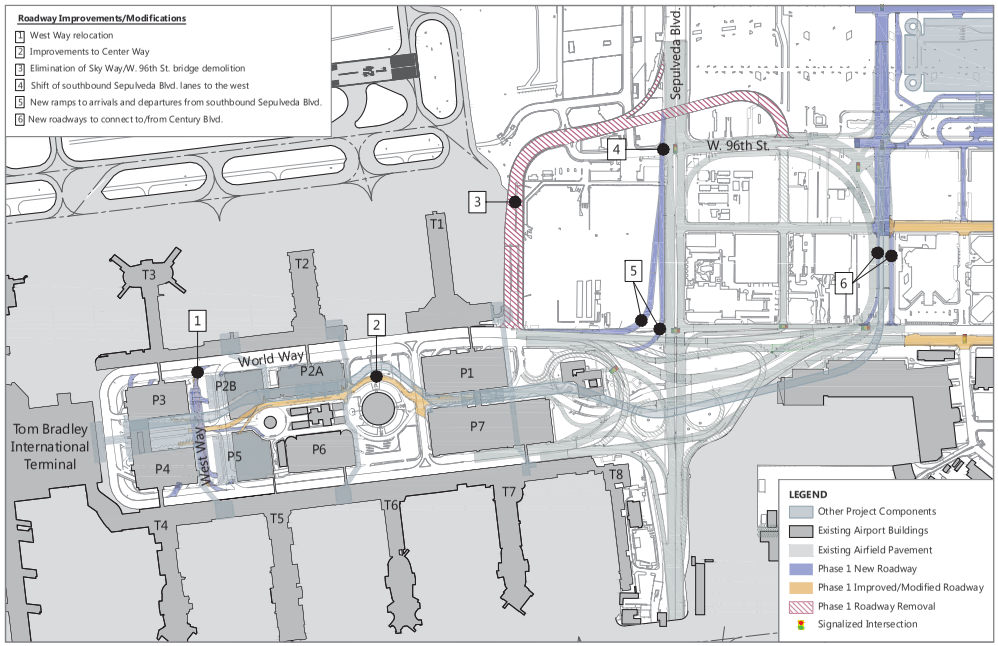


East-West Section View

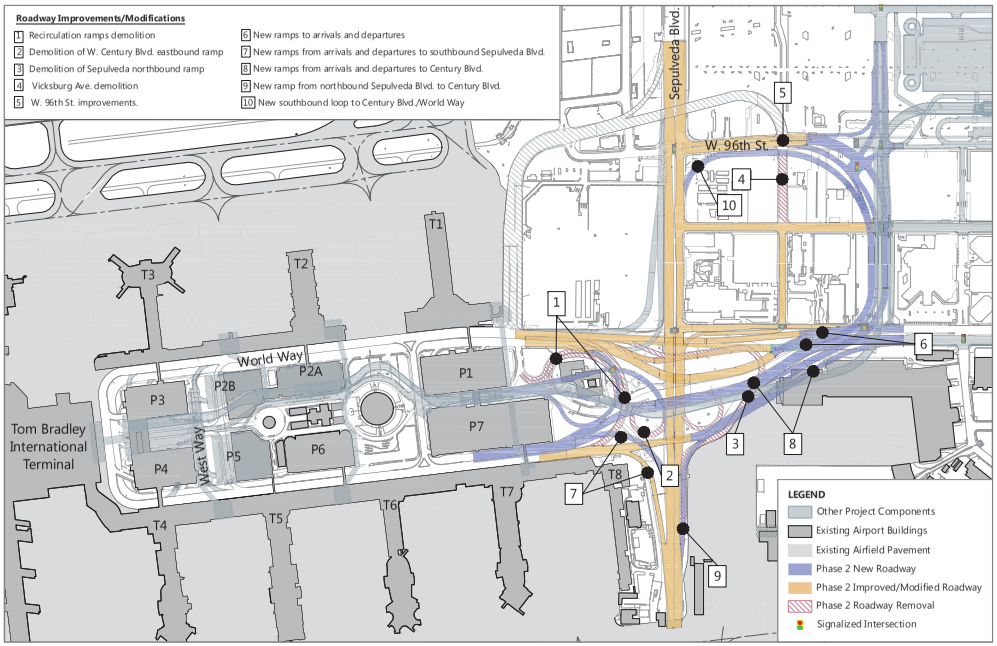
- CONRAC APM Station
- Customer Service Building
- Rental Car Ready/ Return Parking Area
- Quick Turnaround Area (QTA)
- QTA Support Facilities
- Idle Storage
- Bus Plaza
- Eliminate over 3,200 shuttle trips a day

Roadway Improvements: Central Terminal Area

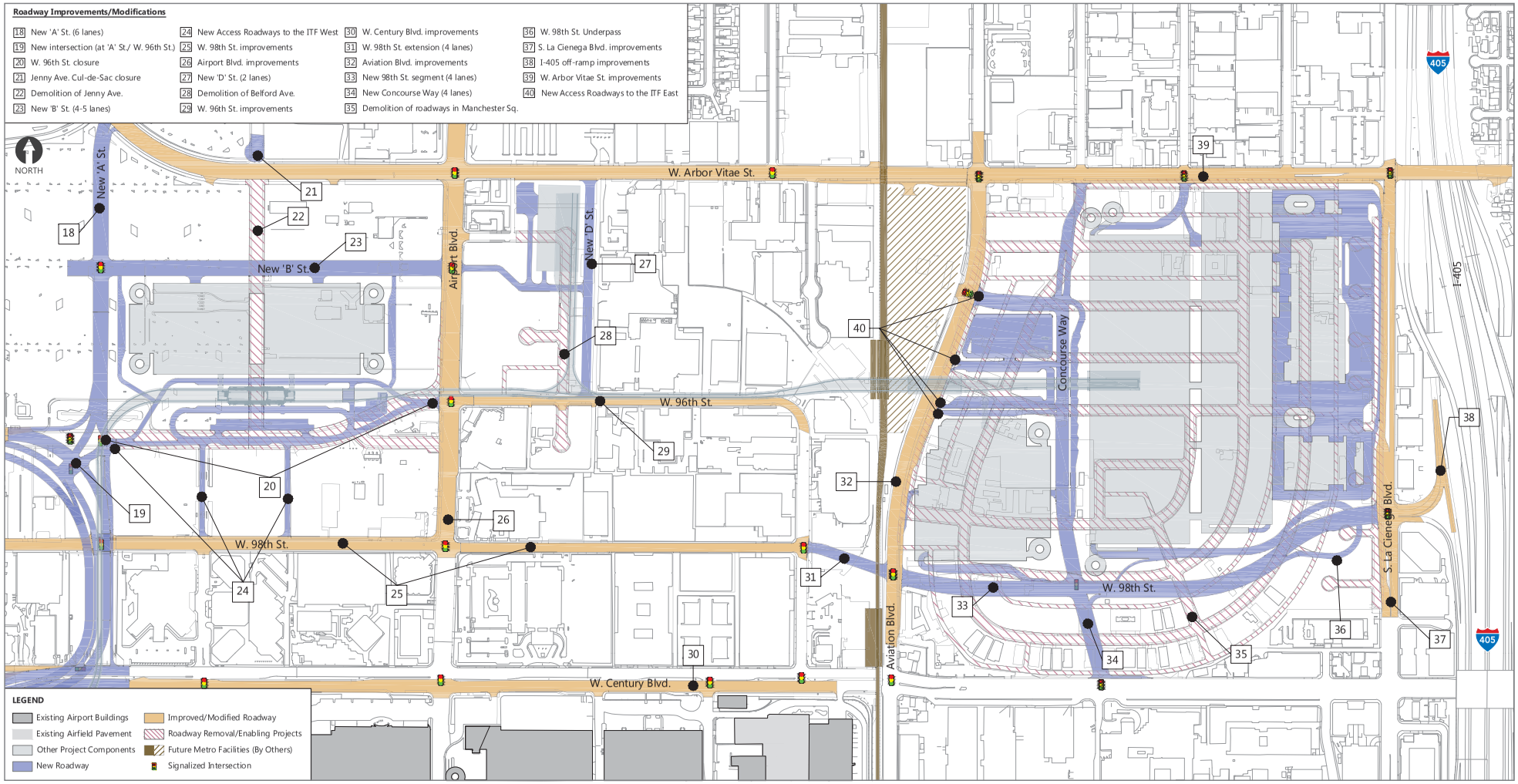
Phase 1



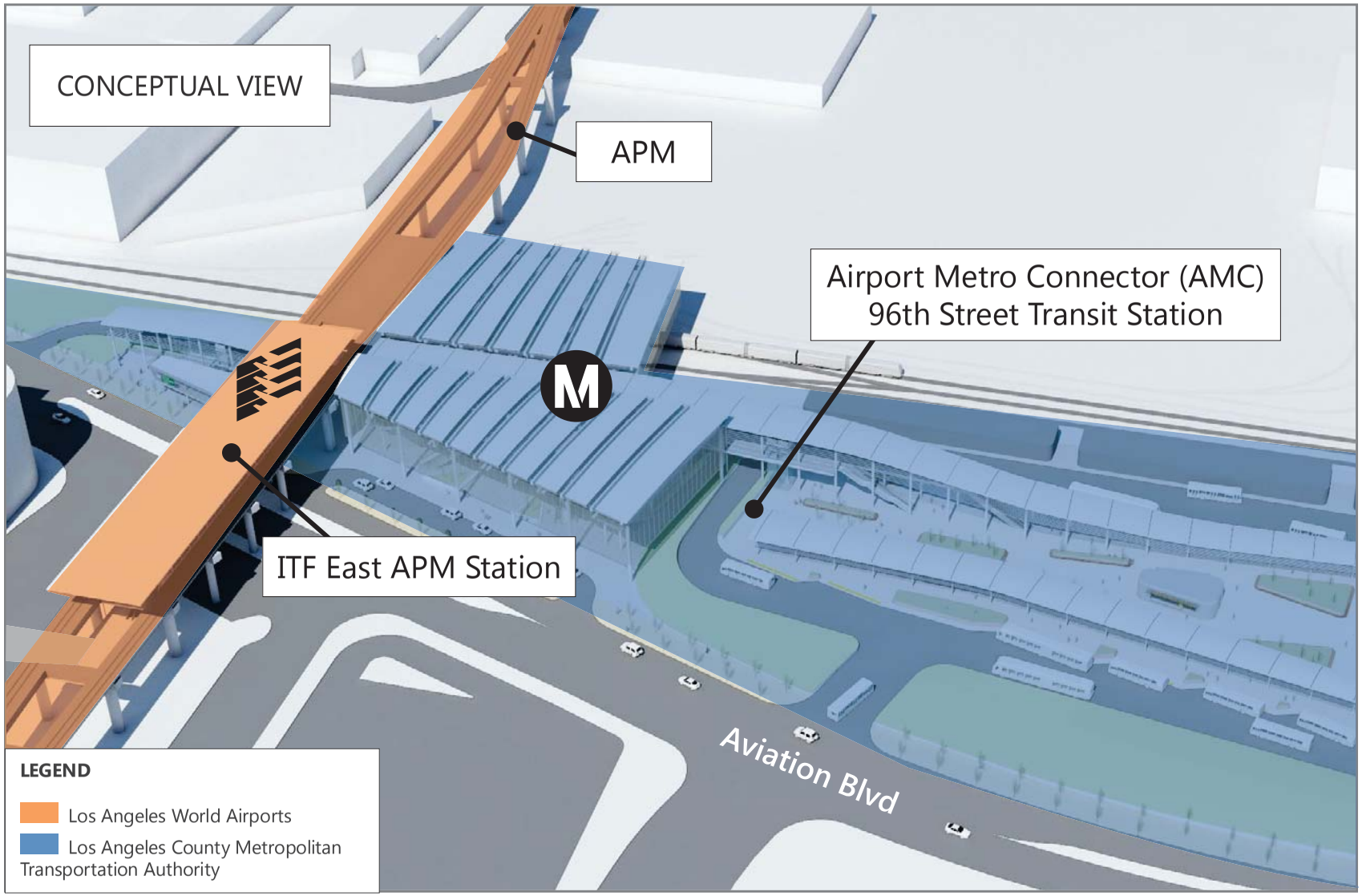
Phase 2



Roadway Improvements: East of Central Terminal Area



AMC 96th Street Transit Station/ITF East Connection



Enabling Projects

Facilities to be Removed

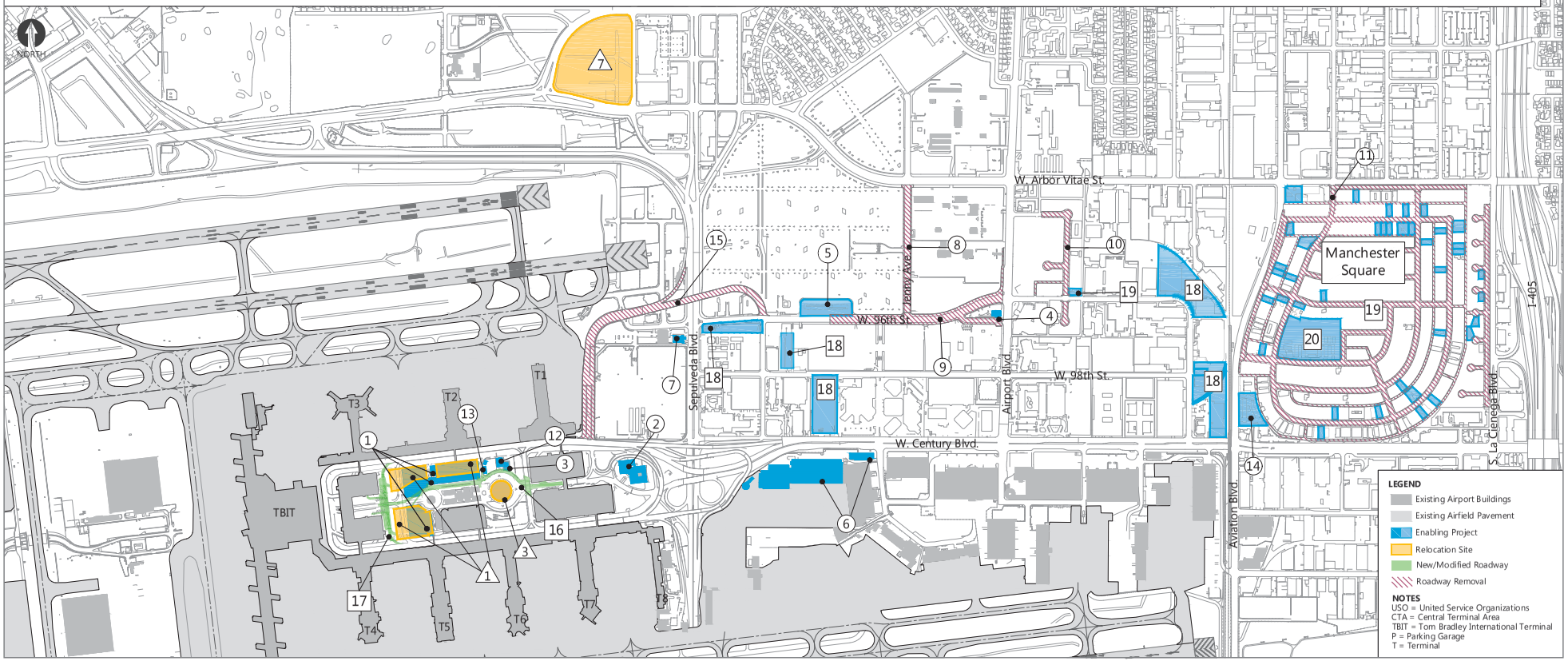
1. Parking garages P2A, P2B, and P5
2. Clifton Moore Administration Building (Admin East)
3. Bob Hope Hollywood USO
4. Restaurant building
5. LAX City Bus Center
6. Hangar Complex
7. Reliant Medical Center
8. Jenny Ave.
9. 96th Street between Vicksburg Ave. and Airport Blvd.
10. Belford Area secondary roadways
11. Manchester Square secondary roadways
12. Drug Enforcement Adminstration Building
13. Operations Trailers
14. Travelodge
15. SkyWay / 96th Street Bridge

Facility Relocation Sites

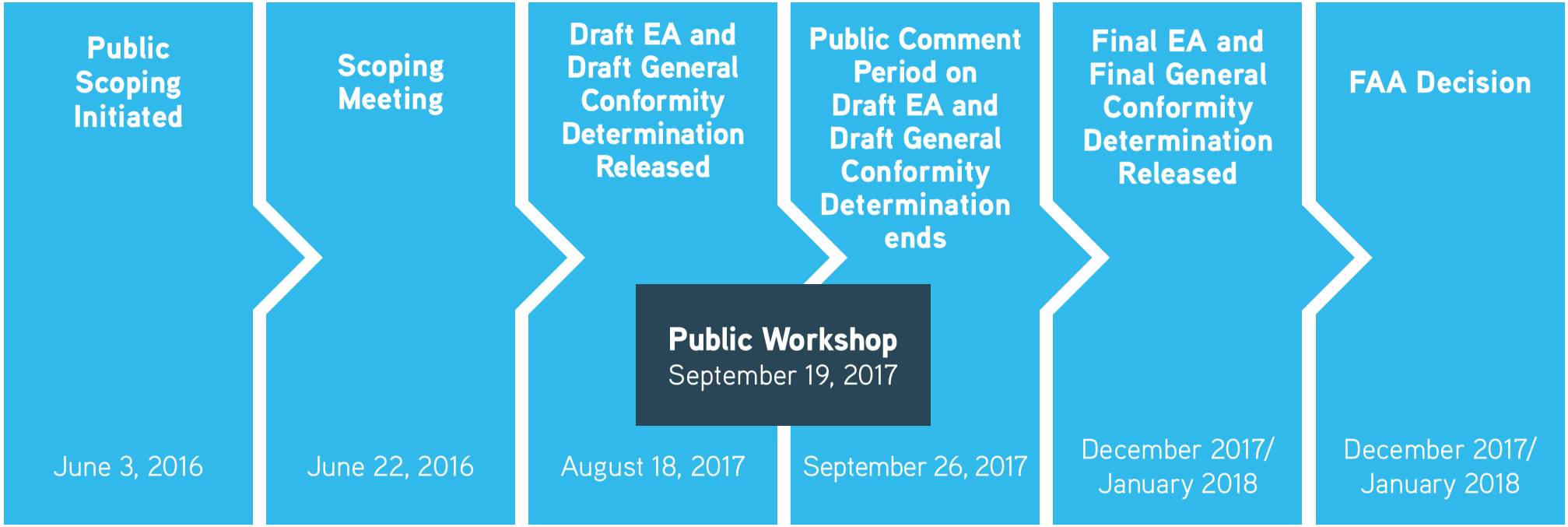
1. Replacement garages in CTA
3. Bob Hope Hollywood USO (multiple potential locations)
7. Reliant Medical Center (potential)

Other Enabling Projects

16. Improvements to portions of Center Way within the CTA
17. West Way Relocation
18. Land acquisition
19. Completion of the Manchester Square acquisition program
20. Stella Middle Charter Academy and Bright Star Secondary Charter Academy



Environmental Process (NEPA)



A separate California Environmental Quality Act (CEQA) process was conducted by the Los Angeles World Airports (LAWA).

- Draft EIR – released September 15, 2016
- Final EIR – certified March 2, 2017

Purpose and Need

PURPOSE OF THE PROPOSED ACTION:

- Improve access options and the landside travel experience for passengers
- Enhance efficiency and alleviate delays on and congestion of on-Airport and surrounding roadways
- Shift the location of a portion of traffic from the Central Terminal Area (CTA) to locations outside the CTA and off the surrounding street network
- Provide a direct connection to the Metro rail and transit system
- Improve connectivity and mobility for airport passengers, visitors, and employees between the regional ground transportation system and LAX

PROPOSED ACTION IS NEEDED TO:

- Reduce vehicle travel times and distance and provide traffic congestion relief;
- Reduce traffic congestion and provide additional parking during peak periods;
- Reduce vehicle congestion and conflicts within the CTA and surrounding streets;
- Provide improved transit connectivity; and
- Provide a consolidated rental car facility to reduce crowded and uncomfortable passenger conditions on the terminal curbside by removing the rental car shuttles from the CTA.

Alternatives

BUILD ALTERNATIVES

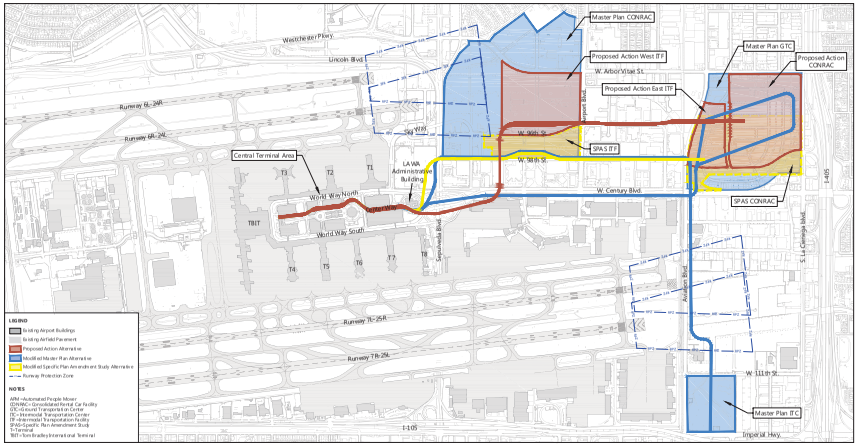
	Modified Master Plan Alternative	Modified SPAS Alternative	Proposed Action Alternative
Automated People Mover			
Alignment within the CTA	ALL BUILD ALTERNATIVES: • Elevated alignment down Center Way • Three stations through CTA		
Alignment outside the CTA	TWO SEPARATE APM ALIGNMENTS: • One route connecting ITC & CONRAC to CTA via W. 98th Street and Aviation Boulevard • One route connecting the GTC to the CTA via an alignment along the south side of W. Century Boulevard	Single APM alignment connecting CTA to CONRAC & ITF via W. 98th Street	Single APM alignment connecting CONRAC, ITFs to CTA via W. 96th Street
Intermodal Transportation Facilities			
Location(s)	Manchester Square Imperial Highway and Aviation Boulevard	Between W. 96th and W. 98th Streets, between Vicksburg Avenue and Airport Boulevard	Manchester Square The area bound by W. 98th Street to the south, Airport Boulevard to the east, Westchester Parkway to the north, and Parking Lot C parking lot to the west
Size	164 Acres	14 Acres	55 Acres
Parking Spaces	N/A	4,900	16,300
Consolidated Rental Car Facility			
Location	Existing Parking Lot C	Manchester Square	Manchester Square
Size	181 Acres	63 Acres	69 Acres
Parking Spaces 1/	26,100 1/	17,800	19,522

Note: 1/ Reflects A Minimum Number Of Spaces.

NO BUILD ALTERNATIVES

- No Action Alternative
- Use of Alternative Modes of Transportation
- Use of Other Public Airports
- Transportation Demand Management

Comparison of Build Alternatives



Screening analysis performed as part of the Draft EA determined that only the Proposed Action Alternative meets the purpose and need.

Air Quality & General Conformity

The Clean Air Act requires federal agencies to demonstrate that actions conform to the applicable State Implementation Plan (SIP) before they can approve that action.

General Conformity:

- Applies to any criteria pollutants for which an area is in nonattainment or maintenance status.
- FAA is required to determine if a project "conforms" to the current SIP by ensuring that the action does not:
  - cause or contribute to any new violation of any national ambient air quality standard (NAAQS);
  - increase the frequency or severity of any existing violations of any NAAQS; or
  - delay the timely attainment of any NAAQS or any required interim emission reductions or other milestones.
- A General Conformity Determination (GCD) is required if emissions are above applicable thresholds.
- An emissions inventory for all project-related direct and indirect emissions are compared with applicable thresholds.

APPLICABLE THRESHOLDS

CRITERIA POLLUTANT	ATTAINMENT STATUS (SEVERITY) 1/	POLLUTANT(S)	*DE MINIMIS* THRESHOLD (TONS PER YEAR)
Carbon Monoxide (CO)	Attainment - Maintenance	CO	100
Fine Particulate Matter ($PM_{2.5}$)	Nonattainment – Serious 2/	$PM_{2.5}$	70
Lead (Pb)	Nonattainment	Pb	25
Nitrogen Dioxide (NO_2)	Attainment - Maintenance	NO_2	100
Ozone (O_3)	Non-attainment – Extreme 3/	NOX	10
		VOC	10
Respirable Particulate Matter (PM_{10})	Attainment - Maintenance	PM_{10}	100

Notes:
1/ Status as of June 17, 2016.
2/ Classified as moderate nonattainment for 2012 NAAQS and serious nonattainment for 2006 NAAQS. Thus, for conformity purposes the serious nonattainment de minimis threshold will be used.
3/ The South Coast Air Basin had not attained the 1-hour O3 standard by the time it was replaced with the 1997 8-hour O3 standard. Therefore, the State Implementation Plan for the South Coast must still contain demonstrations that the 1-hour O3 standard will be attained.

General Conformity Analysis

PROPOSED ACTION CONSTRUCTION EMISSIONS

Construction emissions for the Proposed Action Alternative exceed thresholds for NOx for the LA region

	ESTIMATED ANNUAL EMISSIONS OF CRITERIA POLLUTANTS (TONS/YEAR)				
Construction year	CO	VOC	NO_X	PM_{10}	$PM_{2.5}$
Phase 1					
2018	21	5	18	2	1
2019	33	4	36	3	1
2020	29	4	35	3	1
2021	19	2	20	2	1
2022	10	1	11	1	1
2023	8	<1	7	1	<1
2024	3	<1	2	<1	<1
Phase 2					
2025	<1	<1	<1	<1	<1
2026	<1	<1	<1	<1	<1
2027	<1	<1	<1	<1	<1
2028	<1	<1	<1	<1	<1
2029	<1	<1	<1	<1	<1
2030	<1	<1	<1	<1	<1
Peak Annual Emissions	33	5	36	3	1

General Conformity Determination required

PROJECT-RELATED OPERATIONAL EMISSIONS

Project-related operational emissions decrease, when compared to the No Action Alternative for the same timeframe.

	EMISSIONS (TONS/YEAR)		
Pollutant	2024	2030	2035
CO	-45	-89	-72
VOC	0	-1	0
NO_X	-2	-3	-1
SO_X	0	0	0
PM_{10}	-6	-17	-17
$PM_{2.5}$	-1	-5	-4

Note: Project-related emissions reflect the emissions of the Proposed Action Alternative Project minus the No Action Alternative.

All emissions associated with the Proposed Action Alternative are below the NAAQS thresholds for all modeled years.

General Conformity Determination

Draft Determination: Emissions from the Proposed Action Alternative conform to the SIP and meet the criteria for conformity under the General Conformity regulations.

- South Coast Air Quality Management District (SCAQMD) determined that emissions are included in the general conformity budget for NOx in the 2012 Air Quality Management Plan (AQMP)
- 2012 AQMP is current SIP for the LA region.
- 2016 AQMP, adopted by SCAQMD in March 2017, includes the LAX Landside Access Modernization Program construction NOx emissions.

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

May 10, 2016

Ms Lisa Trifiletti
Deputy Executive Director
Environmental Programs Group
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

Dear Ms. Trifiletti,

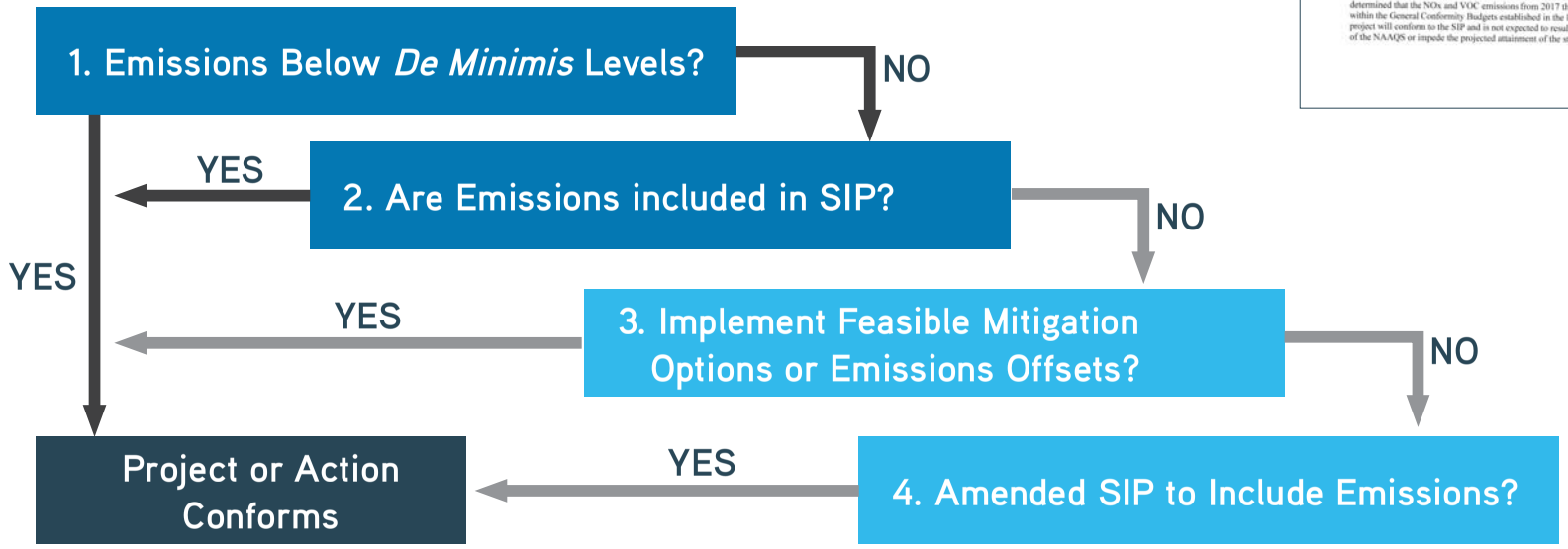
Thank you for meeting with South Coast Air Quality Management District (SCAQMD) staff and providing us with the anticipated construction emissions for NOx and VOC (dated May 3, 2016 and attached) for Phase I of the LAX Landside Access Modernization Program (LAMP) for general conformity purposes.

The conformity determination process is intended to demonstrate that a proposed Federal action will not: (1) cause or contribute to new violations of a national ambient air quality standard (NAAQS); (2) interfere with provisions in the applicable SIP for maintenance of any NAAQS; (3) increase the frequency or severity of existing violations of any standard; or (4) delay the timely attainment of any standard.

The South Coast Air Basin (Basin) is designated as extreme non-attainment for ozone and serious non-attainment for PM2.5. To streamline the review process and to facilitate conformity determinations for projects in the Basin, two separate VOC and NOx general conformity budgets were established in the Final 2012 AQMP: 1 tpd of NOx and 0.2 tpd of VOC were set aside for this purpose every year, starting in 2013 until 2030, from the projected emission growth in the Final 2012 AQMP. SCAQMD has set up a tracking system for projects requiring conformity determinations on a first come first serve basis, whereby the project emissions are debited from the applicable set aside accounts until they are depleted.

SCAQMD staff has reviewed the construction emissions submitted for the LAMP and determined that the NOx and VOC emissions from 2017 through 2023 can be accommodated within the General Conformity Budgets established in the Final 2012 AQMP. Therefore, the project will conform to the SIP and is not expected to result in any new or additional violations of the NAAQS or impede the projected attainment of the standards.

Pathways to Demonstrate Conformity

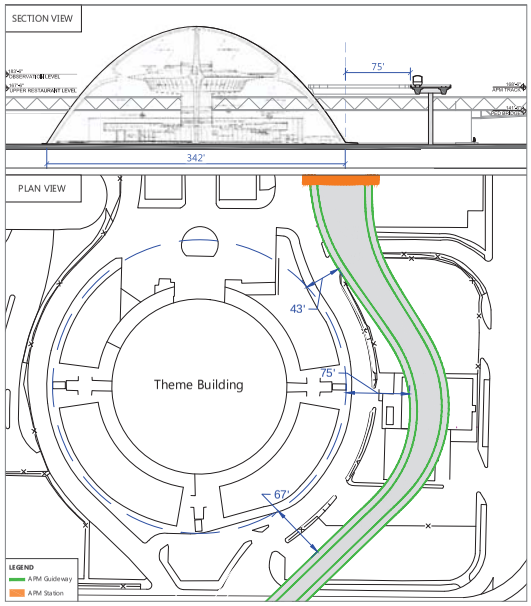


Historic Resources

LAX Theme Building: Eligible for listing on the National Register of Historic Places

- Proposed Action Alternative: Would not physically alter or impact the LAX Theme Building
- LAX Theme Building retains integrity of *location*, *design*, *materials*, *workmanship* and *feeling*
- Visual impact of the APM and pedestrian walkway causes an adverse effect on the Theme Building's setting
- FAA determined adverse effect to the LAX Theme Building
- Requires Memorandum of Agreement (MOA) to mitigate the adverse effect
- State Historic Preservation Officer (SHPO) concurred with the Area of Potential Effect and FAA's determination and use of MOA
- Draft MOA under review by SHPO

View of the Theme Building and New Airport Traffic Control Tower from the Roof of Terminal 1 (looking southwest)



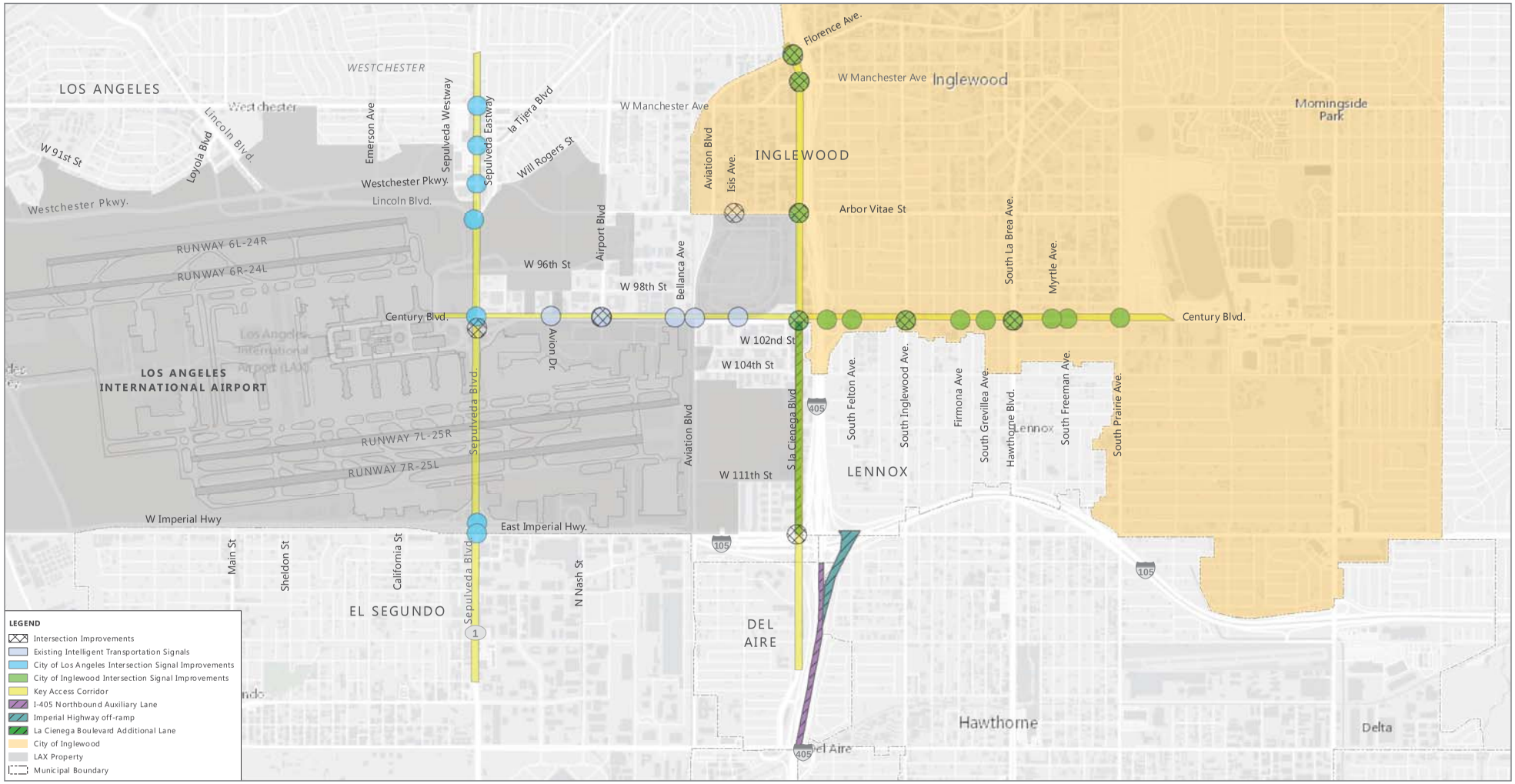
Historic Resources - Mitigation

Mitigation measures included in Memorandum of Agreement (MOA):

- Prepare Historic Structures Report
- Rehabilitate LAX Theme Building for new use that maintains controlled public access
- Preserve remaining open space around LAX Theme Building and develop interpretive program
- Apply following guidelines to final design of APM guideway and pedestrian walkway adjacent to LAX Theme Building:
  - Minimize number of columns and structures by maximizing column support span in this area.
  - Minimize the bulk of the APM guideway structure to preserve openness around the LAX Theme Building.
  - Design the APM and passenger walkway structures to complement the existing LAX Theme Building structure and better harmonize the Project elements and the LAX Theme Building.
  - Implement landscape elements that enhance passenger and visitor's visual focus on the LAX Theme Building.

SIMULATED VIEW OF LAX THEME BUILDING FROM TERMINAL 2 DEPARTURES LEVEL

Proposed Traffic Improvements



Public Comments

- Comments can be handwritten on comment forms and submitted at this Public Workshop
- Comments can be typed and submitted on the laptops provided at this Public Workshop
- Comments can be mailed to:

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

- For additional information and/or to submit comments, visit **http://www.lawa.org/ourLAX/Comments.aspx**
- Comments must be received by 5:00 p.m., Pacific Time, Tuesday, September 26, 2017
- Copies of the Draft EA can be reviewed at:
  - LAWA Offices (1 World Way, Room 218)
  - FAA, Western-Pacific Region Office (15000 Aviation Boulevard, Room 3024)
  - Westchester-Loyola Village Branch Library
  - Dr. Mary McLeod Bethune Regional Branch Library
  - Culver City Library
  - El Segundo Library
  - Hawthorne Library
  - Inglewood Library
  - www.connectinglax.com

Los Angeles International Airport (LAX) Landside Access Modernization Project
Draft Environmental Assessment (DEA)
Public Workshop
Tuesday, September 19, 2017 (5:00 p.m. – 8:00 p.m.)

SIGN – IN
Elected Officials/*Registro de Funcionarios Electos*

Name/*Nombre*	**Organization**/*Organización*	**Address**/*Domicilio*	**Phone**/*Teléfono*	**Fax**	**E-mail**/*Correo electrónico*
GEOFF THOMPSON	CD11 - MIKE BONIN				geoff.thompson@lacity.org

Los Angeles International Airport (LAX) Landside Access Modernization Project
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KAREN Weiss	The Breakers	730 Vista del Mar	310 739-5709		MALibudd@AOL.com
David Frelow	E-Nor Traffic Control	16213 Illinois Ave. Paramount, CA. 90723	562 719-6033		David@enortraffic.com
Seena Samimi	JMBM / TPS	1900 Ave of the Stars, 7th Floor Century City, Los Angeles, CA 90067	310 785-5344		ssamimi@jmbm.com
Delbara Dorsey	Everfield Consulting (SBE, LSBE DBE/ACE)	2075 W. 235th Pl Torr, CA 90501	310.251.7165		deldorsey@everfieldconsulting.com
BRUCE SCHELDEN	SELF				
Debora-Roberts	SELF				

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Anne Nolan	Matt McDonald	1000 Wilshire Blvd #900	310-954-1836	—	anne.nolan@mottmac.com
Ryan Zulauf	LA-ADO FAA	15000 Aviation Blvd Lawndale	310-725-6849	—	ryan.zulauf@faa.gov
Henry Guzman		8731 Lilienthal ave	310 560-0566	—	hgv258@gmail.com
L. Wong		6649 West 87 St LA 90045	(310) 614-197[illegible]		
Della Chi	LAWA/RSH	West Admin	310 692-2053		dchi@lawa.org
Ross Conrad		8700 Pershing Dr Unit 4305	719-964-2020		rsconrad@gmail.com

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Dee Phan	FAA _ LA ADO	15000 Aviation Blvd Lawndale, CA			
Linh Sevilla					
VIRGIL SEVILLA		1100 IMPERIAL AVE #F EL SEGUNDO CA 90245	310 780 4961		
Joseph Dore		6617 W. 87th Place Wst Cal 90045			
NICK BOYIARIS		7542 W. 89th ST. LA, CA 90045	510 645-7367		[illegible]@netzero.net
ROD BOSO	ARINC-RETIRED				

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Charles & Susan Maham	PDR. Home owners	8180 Manitoba St. #344 PDR 90723	310 462-3048	—	
[illegible]					
T.R. FREUTEL	HOME OWNER	6047 W. 86 PL LA CA 90045	310-422-8[illegible]		
MO and BONNIE SADRPOUR	91 St. Homeowners	7100 W. 91 St. LA. CA. 90045	310-645-2342		bonniesadrpour@yahoo.com
BEN CHAI		1536 DALMATIA DR SAN PEDRO, CA 90732	213-848-4385		BCHAI24@YMAIL.COM
Tattianna Sidhom		449 mavis Dr	(323)404-7553		

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Mathew Klemp		950 Main St #108 El Segundo, CA			emcken@gmail.com
Sue Hallett		8163 Redlands St. #49 PDR 90293			
Amber R [illegible]		1800 Westchester Pky			[illegible]
Dino Marsocci		8779 [illegible] LA 90045			dinomars@aol.com

Appendix P.4

Responses to Comments

Comments Received on the Draft EA

The Draft EA was available for review by the general public, government agencies, and interested parties for a period of 40 days. The Notice of Availability (NOA) of the Draft EA for review was published on August 18, 2017.

Seven (7) written comment letters were received on the Draft EA during the public review period. In addition, a public information workshop was held to present the results of the environmental studies, and to receive comments on the Draft EA from the public and government agencies.

Comments and responses are presented on the following pages.

Comment Letter A.1
Page 1 of 2

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

September 26, 2017

Evelyn Quintanilla
LAWA Environmental Programs Group
P.O. Box 92216
Los Angeles, CA 90009-2216

RE: Notice of Availability of Draft Environmental Assessment and Draft General Conformity Determination for the Los Angeles International Airport Landside Access Modernization Program

Dear Ms. Quintanilla:

Thank you for the opportunity to comment on the proposed LAX Landside Access Modernization Program (LAMP). This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed Project.

Over the past several years, both Metro and Los Angeles World Airports (LAWA) have worked closely to provide a connection between Metro's regional transit system and LAX. The proposed connection includes LAWA's Automated People Mover (APM) System, which is planned as part of the LAMP. Metro and LAWA have been coordinating on parallel planning and development efforts for the Airport Metro Connector (AMC) 96th Street Transit Station and LAWA's APM Station, respectively. Because both projects will be built in close proximity and during the same time period, successful completion requires LAWA and Metro to collaborate and coordinate with respect to the design and construction of the planned transit stations, as well as roadway improvements, utility relocations, on-site work and other new accommodations in the immediate vicinity. A.1-1

To ensure coordination and communication between the two agencies, Metro is providing the following comments on the LAWA's LAMP Draft Environmental Assessment (EA):

- *Design/Engineering Coordination of the APM Project:* As a continuation of current coordination activities, LAWA and Metro are striving to develop a mutually agreeable design that seamlessly connects passengers between the APM Station and the AMC 96th Street Transit Station. Both agencies need to ensure that the APM guideway structure and support columns do not conflict with the construction or operation of Metro facilities, including the Crenshaw/LAX Transit Project, the AMC 96th Street Transit Station, and the Southwestern Maintenance Yard. A.1-2
- *Aviation Boulevard Roadway Improvements:* The LAMP EA identifies roadway improvements along Aviation Boulevard. Both agencies need to coordinate on the final configurations of the new driveways, intersections, and traffic signal phasing. A.1-3
- *Multi-use Path on Aviation Boulevard:* There will be a multi-use path on the west side of Aviation Boulevard between Arbor Aviate Street and 98th Street. Both agencies need to coordinate on the funding, design, and construction of this multi-use path and its integration with the AMC 96th Street Transit Station. A.1-4

Comment Letter A.1
Page 2 of 2

LAX LAMP
NOTICE of Draft EA & Draft Conformity Determination – Metro Comments
September 26, 2017

- *Arbor Vitae Street:* The LAMP EA proposes roadway improvements on Arbor Vitae Street. Both agencies need to coordinate on the design, construction and its integration with the AMC 96th Street Transit Station. A.1-5

- *Demolition of LAX City Bus Center:* For the enabling projects, the LAMP EA proposes demolishing the LAX City Bus Center. A temporary relocation of this facility is needed. As LAWA is aware, the new bus plaza planned as part of the AMC 96th Street Transit Station is intended to eventually replace the LAX City Bus Center. However, until the AMC 96th Street Transit Station is opened for passenger service, LAWA must work with Metro and other municipal bus operators to identify a temporary bus facility site that can accommodate the essential functions provided at the existing LAX City Bus Center. Furthermore, in order to ensure continuous, uninterrupted bus transit service within the LAX area, LAWA will need to coordinate with the bus transit operators, currently using the LAX City Bus Center, to ensure a seamless transition of services to this new temporary bus facility. A.1-6

- *W. 98th Street Extension between Aviation Boulevard and Bellanca Avenue:* The construction of the 98th Street Extension may provide for the rerouting of bus transit service along W. 98th Street between the ITF West and the new AMC 96th Street Transit Station. As part of this improvement, please ensure that the design of the new signalized intersection at W. 98th Street and Aviation Boulevard will accommodate the turning movements of bus transit vehicles. A.1-7

- *Operational Options on W. 98th Street:* LAWA should take into consideration the potential bus transit service planned for the ITF West and the new AMC 96th Transit Station. A.1-8

Revisions to the EA text:

- Figure 2-4 (p. 85) is sourced to "Metropolitan Transit Authority." Please change it to "Los Angeles Metropolitan Transit Authority." A.1-9

- Refer to Metro station at Aviation/96th Street as AMC 96th Street Transit Station consistently A.1-10

- When referencing the Metro Rail lines at the AMC 96th Street Transit Station, the station would be served by both the future Crenshaw/LAX Line and the service extension of the Green Line A.1-11

- Third Bullet point under Section ES. 2.3 (p. ES-5): Please include the AMC 96th Street Transit Station and Metro Green Line. A.1-12

Metro looks forward to continuing our cooperative, working relationship with LAWA on our respective, but independent projects. If you have any questions regarding this response, please contact Derek Hull at 213-922-3051, by email at DevReview@metro.net or by mail at the following address: A.1-13

Metro Development Review
One Gateway Plaza MS 99-18-3
Los Angeles, CA 90012-2952

Sincerely,

Derek Hull
Manager, Transportation Planning

Page 2 of 2

Responses to Comment Letter A.1

Response A.1-1

The comment is noted. LAWA is committed to continuing its working relationship with Metro on the LAX Landside Access Modernization Program throughout design, construction, and implementation. LAWA thanks Metro for its continued support and interest in making a connection between LAWA's APM and Metro's AMC 96th Street Transit Station and will continue to coordinate with Metro to ensure that both projects are successful. Please see Responses to Comments A.1-2 through A.1-12 below.

Response A.1-2

The connection between the proposed ITF East APM Station and Metro's proposed AMC 96th Street Transit Station is discussed in Section 1.2 in Section 1, Introduction and Background, and in Section 2.3.4 in Section 2, Purpose and Need, of the Draft EA. LAWA is committed to working with Metro to ensure that the interface between the two projects is seamless, and will coordinate with Metro during design, construction, and implementation. LAWA is working closely with Metro on the preliminary design of the APM guideway structure and column placement to ensure that construction of the APM does not interfere with Metro's operation of the Crenshaw/LAX transit line, the AMC 96th Street Transit Station, or the Southwestern Maintenance Yard.

Response A.1-3

LAWA has conducted several coordination meetings with Metro on the proposed improvements to Aviation Boulevard, particularly the locations of signalized intersections and driveways, and will continue to coordinate with Metro on these issues, as well as traffic signal phasing throughout the design, construction, and implementation of both the LAX Landside Access Modernization Program and Metro's AMC 96th Street Transit Station.

Response A.1-4

LAWA and Metro have executed a Master Cooperative Agreement which expands upon the cooperation protocol, establishes clear processes for design review and approvals, coordinates construction work and inspection activities, and establishes advisory committees to facilitate regular coordination amongst the agency staff. Numerous coordination meetings have been conducted with Metro on the proposed multi-use path along Aviation Boulevard and LAWA will continue to coordinate with Metro throughout the design, construction, and implementation of both the LAX Landside Access Modernization Program and Metro's AMC 96th Street Transit Station.

Response A.1-5

The proposed roadway improvements on W. Arbor Vitae Street are discussed in Section 1.2.2 in Section 1, Introduction and Background, of the Draft EA. LAWA has developed a cooperation protocol with Metro, conducted numerous coordination meetings with Metro on the proposed improvements at the intersection of Aviation Boulevard and W. Arbor Vitae Street, and will continue to coordinate with Metro throughout the design, construction, and implementation of both the LAX Landside Access Modernization Program and Metro's AMC 96th Street Transit Station.

Response A.1-6

The demolition of the LAX City Bus Center is discussed in Table A-2 in Appendix A of the EA. As discussed therein, the primary functions of this facility are proposed to be relocated adjacent to the Metro Crenshaw/LAX Line, currently under construction, adjacent to the proposed Metro AMC 96th Street Transit Station.

The LAX City Bus Center will be temporarily reconfigured in Lot C. The demolition and temporary relocation of the LAX City Bus Center is currently planned to start in the first quarter of 2018 and be completed by the end of the third quarter of 2018. LAWA will coordinate with Metro and all affected bus line operators.

Response A.1-7

The plans for the extension of W. 98th Street between Aviation Boulevard and Bellanca Avenue are discussed in Section 1.2.2 in Section 1, Introduction and Background, of the Draft EA. LAWA and Metro have executed a Master Cooperative Agreement which expands upon the cooperation protocol with Metro, discusses the process for design review and approvals, and coordinates construction activities and inspection activities. Metro and LAWA have conducted numerous coordination meetings on the proposed improvements associated with the extension of W. 98th Street and will continue to coordinate with Metro throughout the design, construction, and implementation of both the LAX Landside Access Modernization Program and Metro's AMC 96th Street Transit Station. The proposed intersection at W. 98th Street and Aviation Boulevard would be designed to accommodate the turning movements of bus transit vehicles.

Response A.1-8

Please see Response to Comment A.1-7 regarding coordination with Metro and design considerations for bus transit vehicles. The traffic analysis conducted by LAWA included consideration of bus transit routes operating at the ITF West and Metro's AMC 96th Street Transit Station.

Response A.1-9

The requested revision to the source for Figure 2-4 was made in the Final EA, as requested.

Response A.1-10

References to the AMC 96th Street Transit Station have been made consistent throughout the Final EA, as requested.

Response A.1-11

References to the rail lines serving the AMC 96th Street Transit Station have been made consistent throughout the Final EA, as requested.

Response A.1-12

The comment references the third bullet under Section ES 2.3 on page ES-5. However, page ES-5 is Figure ES-1 and Section ES 2.3 is Requested Federal Actions. We believe the commenter is referring to the third bullet under Section ES 2.2 on page ES-3; the requested edit has been made to this section in the Final EA.

Response A.1-13

LAWA is committed to continuing its working relationship with Metro on the LAX Landside Access Modernization Program throughout design, construction, and implementation. LAWA thanks Metro for its continued support and interest in making a connection between LAWA's APM and Metro's AMC 96th Street Transit Station and will continue to coordinate with Metro to ensure that both projects are successful.

Comment Letter P.1
Page 1 of 1

From: deldorsey@everfieldconsulting.com
To: LAX Stakeholder Liaison
Subject: Stakeholder Comment Submitted - Ref. No. 170919200724
Date: Tuesday, September 19, 2017 8:07:36 PM
Attachments: ATT00001.bin

This is to inform you that a comment from OURLAX.ORG website was submitted.

It may not reflect on the excel file yet the current submitted form as the file is being updated every end of the day.
Here is the link to the excel file \\slaxVBfiler01\enterprisedev\reports\laxmp

Reference No.:	170919200724
Date Submitted:	9/19/2017
From:	Delbara Dorsey
Email:	deldorsey@everfieldconsulting.com
Company Name:	Everfield Consulting, LLC
Address:	
City:	
State:	
Zip Code:	0
Project Name:	LAMP - Draft EA
Other Comments:	Outstanding workshop format Allison Sampson was extremely helpful in sharing EA details. the brochures by DAKOTA communications where impressive, easy to read and highlighted key facts.

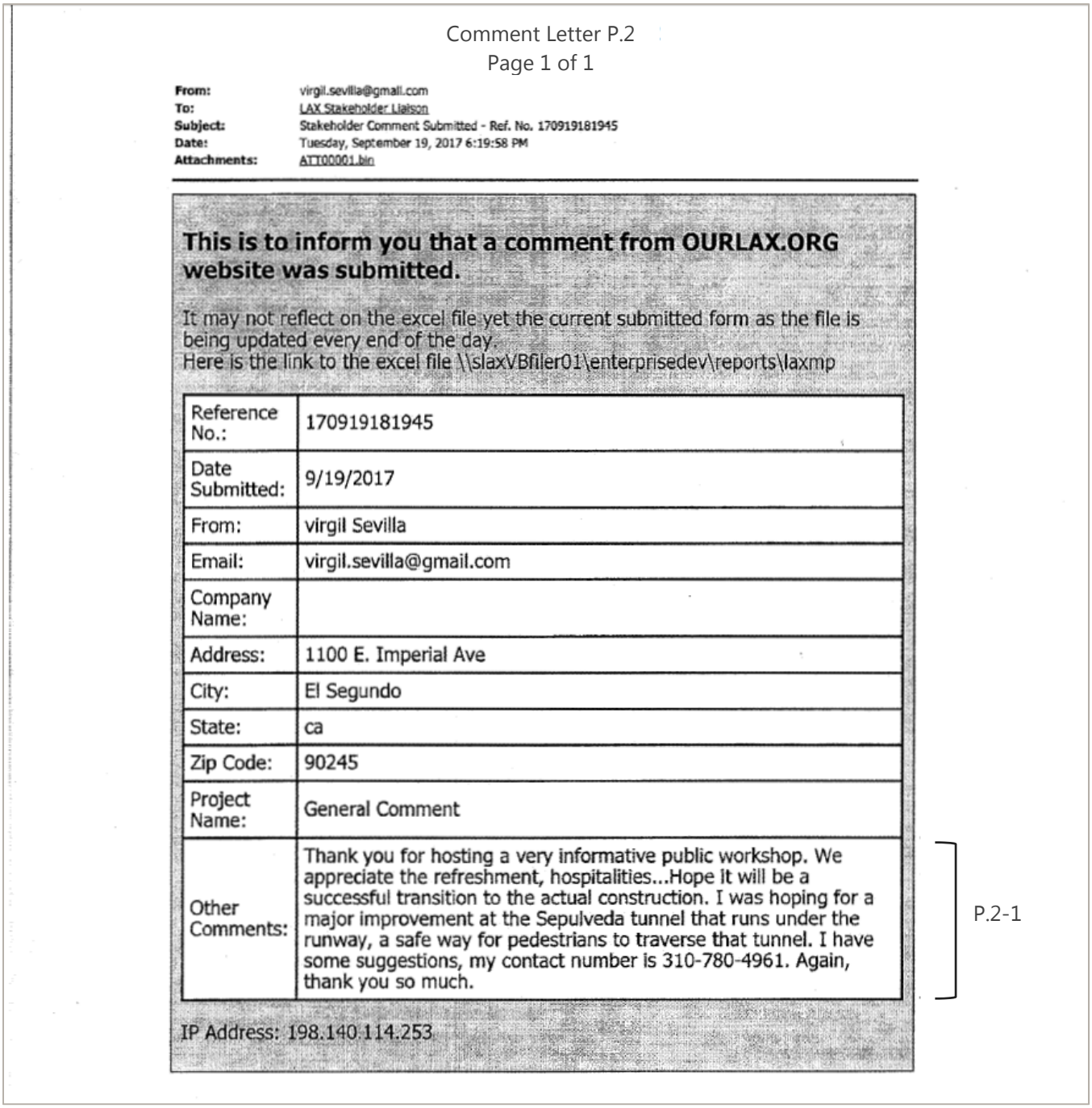
IP Address: 198.140.114.253

P.1-1

Response to Comment Letter P.1

Response P.1-1

The comment is noted.



Comment Letter P.2
Page 1 of 1

From: virgil.sevilla@gmail.com
To: LAX Stakeholder Liaison
Subject: Stakeholder Comment Submitted - Ref. No. 170919181945
Date: Tuesday, September 19, 2017 6:19:58 PM
Attachments: ATT00001.bin

This is to inform you that a comment from OURLAX.ORG website was submitted.

It may not reflect on the excel file yet the current submitted form as the file is being updated every end of the day.
Here is the link to the excel file \\slaxVBfiler01\enterprisedev\reports\laxmp

Reference No.:	170919181945
Date Submitted:	9/19/2017
From:	virgil Sevilla
Email:	virgil.sevilla@gmail.com
Company Name:	
Address:	1100 E. Imperial Ave
City:	El Segundo
State:	ca
Zip Code:	90245
Project Name:	General Comment
Other Comments:	Thank you for hosting a very informative public workshop. We appreciate the refreshment, hospitalities...Hope it will be a successful transition to the actual construction. I was hoping for a major improvement at the Sepulveda tunnel that runs under the runway, a safe way for pedestrians to traverse that tunnel. I have some suggestions, my contact number is 310-780-4961. Again, thank you so much.

IP Address: 198.140.114.253

P.2-1

Response to Comment Letter P.2

Response P.2-1

LAWA has taken into consideration pedestrian movements and improvements consistent with the City of Los Angeles plans to provide enhanced pedestrian connections to the LAX Landside Access Modernization Program components such as the Intermodal Transportation Facility (ITF) East and ITF West. Sepulveda Boulevard is a state-owned facility and Caltrans strives to implement pedestrian movements consistent with the City of Los

Angeles plans as well. Pedestrian movement through the Sepulveda Boulevard tunnel is prohibited; signs are posted on both sides of the tunnel stating "Pedestrians, Bicycles, Motor-Driven Cycles Prohibited". The addition of a pedestrian pathway would require the reconstruction of the entire tunnel, which is not part of the Proposed Action. Widening of the tunnel would be logistically challenging and impractical as it goes underneath two active runways and carries a significant amount of traffic on a daily basis. Pedestrians instead must use other parallel routes such as Aviation Boulevard. LAWA has incorporated a set of design guidelines[1] that addresses pedestrian access and safety for LAWA-owned property.

[1] Los Angeles World Airports, LAX Design Guidelines, March 24, 2017.

Comment Letter P.3
Page 1 of 1

From: hguz58@gmail.com
To: LAX Stakeholder Liaison
Subject: Stakeholder Comment Su m itted - Ref. No. 170919200342
Date: Tuesday, Septem er 19, 2017 8:03:54 PM
Attachments: ATT00001. in

This is to inform you that a comment from OURLAX.ORG website was submitted.

It may not reflect on the excel file yet the current su mi tted form as the file is e ing updated every end of the day.
Here is the link to the excel file \\slaxVBfiler01\enterprisedev\reports\laxmp

Reference No.:	170919200342
Date Su mi tted:	9/19/2017
From:	Henry guzman
Email:	hguz58@gmail.com
Company Name:	
Address:	8731 Lilienthal ave
City:	LA
State:	CA
Zip Code:	90045
Project Name:	General Comment
Other Comments:	I see that the airport facilities will e moving closer to the neigh orh oods North of Westchester Parkway. There is already a pro l em with airport employees parking in the neigh ori ng streets at all hours and walking in to work, part of the area has had to go to permit parking to com a t this issue at a cost to them. Are there any provisions in your plan to keep this from continuing and growing. I also notice that your presentation hails this project as improving the conditions for the passengers, ut I do NOT see anywhere where you tout anything good for the people that live in the neigh ori ng areas, why is that

P.3-1

P.3-2

IP Address: 198.140.114.253

Responses to Comment Letter P.3

Response P.3-1

The underlying purposes of the LAX Landside Access Modernization Program are to improve access to LAX and relieve congestion on Airport and surrounding roadways. The Project would relieve congestion by developing a flexible transportation system that provides alternatives to the Central Terminal Area (CTA) for passengers, Airport and other employees, and Airport-related vendors accessing LAX. The Proposed Action proposes construction of ground access facilities east of LAX, not closer to the neighborhoods north of Westchester Parkway (see Figure 1-2 in Section 1, Introduction and Background, of the Draft EA).

The commenter raises concerns about Airport employees parking on residential streets in Westchester, the implementation of permit parking in these neighborhoods, and whether the Proposed Action addresses this issue. As stated above, the purpose of the Proposed Action is to improve access to LAX and relieve congestion on Airport and surrounding roadways. The Proposed Action does not impact nor address Airport-related parking occurring on residential streets; LAWA has no jurisdiction over those streets. However, the Draft EA did evaluate passenger and parking demand for LAX, as documented in Appendix C. Part of the Proposed Action includes construction of parking garages at the Intermodal Transportation Facility (ITF) West, ITF East, and potentially also as part of the Consolidated Rental Car Facility (CONRAC). It is anticipated that additional employee parking would be provided in one of these facilities or in part of Lot C once the ITF West is opened. One of the first components of the Proposed Action to be constructed would be the western public parking garage and curb associated with the ITF West, scheduled to be initiated in 2018 and completed in 2020. Additionally, the Proposed Action includes implementation of a Transportation Demand Management program for LAX-site employees to provide a variety of additional transportation access choices in order to promote non-auto travel (see Appendix A). These measures could reduce any parking demand that may exist on streets outside of Airport facilities.

Response P.3-2

As stated in Section 2, Purpose and Need, of the Draft EA, one of the purposes of the Proposed Action is to enhance efficiency and alleviate delays on and congestion of on-Airport and surrounding roadways. The Draft EA evaluated the potential effects of the Proposed Action compared to the No Action for 2024, 2030, and 2035. Because the Proposed Action would result in improved traffic conditions in the area surrounding LAX (see Section 5.9.4.2.1 of Section 5, Environmental Consequences, of the Draft EA), it would also result in less or similar air quality emissions when compared to the No Action Alternative for the same timeframe (see Tables 5-5 and 5-6 in Section 5.1.4 of Section 5, Environmental Consequences, of the Draft EA). The Proposed Action would also result in reduced greenhouse gas emissions when compared to the No Action Alternative for the same timeframe (see Table 5-12 of Section 5, Environmental Consequences, of the Draft EA). The projected improvements in traffic, air quality emissions, and greenhouse gas emissions would improve conditions for surrounding residences.

Comment Letter P.4
Page 1 of 10

From: Frank Mastroly
Sent: Saturday, September 23, 2017 2:37 PM
To: QUINTANILLA, EVELYN
Subject: Comments on LAX LAMP Draft Environmental Assessment and Draft General Conformity Determination

Comments on LAX LAMP Draft Environmental Assessment and Draft General Conformity Determination

http://connectinglax.com/informed.html

Presented below are my comments on Draft Environmental Assessment & Draft General Conformity Determination. Please note that this LAWA document is difficult to locate on the Connecting LAX website http://connectinglax.com/ . It is buried under NEPA which in turn is under Project Documents. P.4-1

These comments supplement comments made in numerous e-mails to Ms. Evelyn Quintanilla, Chief of Airport Planning, and thus should be read in conjunction with these other documents, especially my e-mail of July 14, 2017 entitled "Comments on LAMP Report 2017-0276_misc_05-12-2017." Admittedly this current document expresses many of the same comments I have had previously but which to date have not been addressed. However, time constraints do not permit me to write a composite unified document. P.4-2

I have read in detail the subject and have several comments. I have also downloaded and read in detail all recent and previous Las Angeles World Airways (LAWA) documents on the proposed Landside Access Modernization Program (LAMP) including the LAMP DEIR and FEIR, and going back to the 2004 Master Plan and various revisions and amendments. I am also very familiar with various other proposed and in progress projects such as Terminals 1.5, 2.5, and 3.5, and the Midfield Satellite Concourse (MSC), and how they all relate to the LAMP. Finally, I have downloaded and read numerous Los Angeles Metropolitan Authority (LA Metro) documents on their proposed W. 96th Street/LAX station at http://www.metro.net/projects/crenshaw_corridor/ as well as being on distribution of LA Metro "Source" documents and numerous readers' comments related to this station.

Thus, I consider myself very familiar with what has been proposed in the past and what is planned for the future. In general, my comments are directed at specific items in the subject report referenced by paragraph, figure, or table number, including links to various related LAWA and LA Metro documents. P.4-3

Table 1-2, Item 4 - Recirculation Ramps Demolition -- Nowhere in the document do you discuss what will, if anything, replace these ramps. Although LAWA wants to discourage automobiles from continuously circulating the Central Terminal Area (CTA) in search of an available parking slot, there will always be a need for these ramps, especially if motorists are confused on which level arriving passengers may be waiting during peaks periods. P.4-4

Table 1-2, Item 29 - W. 96th Street Improvements -- Here you propose widening and restriping W. 96th Street to maintain one travel lane plus parking in each direction to permit the construction of the Automated People Mover (APM). However, you reject routing the APM along W. 98th Street ***because*** it has only one travel lane plus ***some on-street*** parking in each direction. P.4-5

Table 1-2, Item 31 - W. 98th Street Extension, Bellanca Ave. to Aviation Blvd. -- Just a perfect location to have the APM curve north from W. 98th Street to be directly over Aviation and have its station directly above the LA Metro Station W. 96th Street Station where it belongs. P.4-6

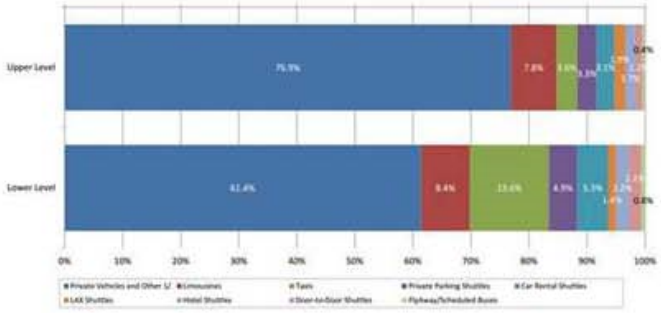
Paragraph 2.3.2.2, Roadway Access -- There is no doubt that there needs to be improved ***passenger*** (***and not just automobile***) access to and from the CTA. However, nothing in the LAMP as currently envisioned will preclude the problem of well-wishers continually circulating the CTA roadways until their party arrives at curbside for pickup. This is because most travelers will prefer to wait curbside rather than walking up to 1,000 feet more to reach a pick-up point. This will be especially true for P.4-7

Comment Letter P.4
Page 2 of 10

passengers with several pieces of luggage, those traveling with or carrying small children, and those who are mobility impaired. Nowhere in any LAMP documentation is this discussed or how these negatively impacted passengers will be accommodated.

In particular, the curbside congestion problems at Terminal 1 should be alleviated once Terminal 1.5 is operational. If that does not occur, then T1.5 will fail to accomplish one primary objective for it. Or does the LAMP simply ignore the future presence of Terminals 1.5, 2.5, and 3.5? If so, then all LAMP documents going back to the DEIR should be revised to reflect these future additions. Not related to LAMP, but will Terminal 1.5 simply ***supplant*** existing check-in and baggage claim facilities in Terminals 1 and 2, or will it ***supplement*** existing facilities in T1 and T2? Similarly, will Terminal 2.5 replace existing facilities in Terminals 2 and 3 now that Delta Airlines is the major tenant in both terminals? Finally, what specific function will Terminal 3.5 perform? It appears to be redundant. P.4-7

Figure 2.3 (reproduced below) clearly illustrates why LAMP may fail in its primary objective of alleviating automobile congestion in the CTA. The private automobile traffic that currently contributes, 77% and 61%, respectively, of total Upper and Lower Levels total vehicular traffic will not be materially reduced by LAMP because of the attendant longer walks required by the locations of the APM stations in the CTA. In addition, I am sure that the various off-airport commercial parking facilities will get around any shuttle restrictions by merely shuttling their customers to and from the CTA using the customer's vehicle. In addition, there probably will be fleets of Uber and Lyft vehicles at the Intermobile Transfer Facilities (ITFs) and the LA Metro W. 96th Street Station offering low cost shuttle service to and from the terminal curbsides. In fact, the LAMP apparently does not restrict these Transportation Network Companies (TNCs) having unrestricted curbside access, a major deficiency of LAMP. P.4-8



Below is Figure 2-5 of the LAMP DEIR showing the proposed APM CTA route, stations, and the passages to and from the various terminals. It is obvious now that the East CTA Station will no longer serve Terminal 1 with the construction of T1.5. Instead, T1.5 will be better served by the Center CTA APM Station which will also serve T2.5 and T4.5 (if there is one). Finally, this figure does not show T3.5 or a passage between it and the East CTA APM Station. To maximize passenger convenience, there should be individual passages for T4, T5, and T6 in line with the center of the respective ticketing and baggage claim areas. I realize that this figure is illustrative only and does not reflect the final configuration. However, the various walking distances will be impacted and need to be documented. These distances need to include not only the lengths of the various passages, but also total walking distances between the Vertical Circulation Cores and the ticketing and baggage claim areas within each terminal. Those who still have unrestricted curbside access can pick and choose which terminal door they use and thus minimize their walking distance. Not so for the APM users. P.4-9

Comment Letter P.4
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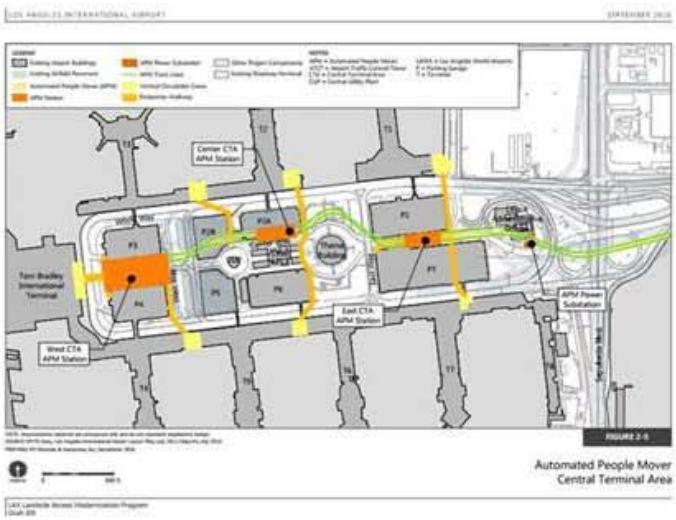

P.4-9

Paragraph 2.3.4. Rail Access -- LAWA is correct in decrying the current lack of regional rail access to LAX. However, the proposed LA Metro LAX/W. 96th Street station is estimated by LA Metro to handle less than 1,800 daily passengers, or approximately 0.7% of total LAX passenger traffic, a proverbial "drop in the bucket". In fact, the need to ride conventional LRT vehicles that don't have amenities to attract passengers with baggage and the need to transfer between two LRT lines will probably restrict usage of this LA Metro station to those passengers without baggage or not traveling with small children, and airport employees, this limiting the attractiveness of this option. In addition, both the LRT and APM will have to operate 24/7 to attract all airport employees.

This compares with over 11% of total JFK traffic carried by their AirTrain to and from Queens, Brooklyn, and Manhattan via two routes (subway and the Long Island Rail Road or LIRR). In addition, the rail services to JFK, SFO. ORD, DFW, ATL, PHL, etc. all provide ***one-seat*** service to and from the respective downtown areas, while the LA Metro service will require at least one intermediate transfer (Blue/Green) for passengers going to or from Downtown LA and Union Station. In fact, at PHL, the SEPTA commuter rail line serves each individual terminal, thus eliminating the need for passengers to transfer to an APM to reach their respective terminal.

P.4-10

The connection between the Expo and Crenshaw lines will be especially inconvenient because the former is elevated and the later is in a subway, requiring two elevation changes. Also, the APMs at SFO, JFK, ORD, etc., all serve each terminal individually, without the need for walks as long as 1,000 feet. It is an insult to the APM systems in place at other US airports to compare them with what is proposed at LAX. They are not in any stretch of the imagination even closely identical.

Paragraph 3.2.5.1 and Appendix E, APM Alignment -- Here we get to what may very well be the Achilles Heel for the LAMP program as currently envisioned. You state that the average total APM travel plus additional walking time will be approximately 14 minutes. Nowhere does LAWA admit that this increases this parameter from its ***current value of zero***, but this fact is conveniently omitted in all LAWA LAMP documents. Nor does LAWA even mention that the longest value would be several minutes longer, perhaps up to 20 minutes, due to the longest walking distance being ***almost 1,000 feet*** vs. an average of ***only*** 690 feet, another fact conveniently omitted in the subject document.

P.4-11

It must be noted here that this document is the ***very first LAMP document to even admit that the LAMP as currently envisioned will add to the total travel time*** for those passengers who will be restricted from enjoying the unrestricted terminal curbside access they currently enjoy. Thus, to be realistic, all passengers not traveling in private automobiles should add 20-30 minutes to the recommended arrival time at LAX before scheduled boarding (not departure) time.

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Per http://www.laxishappening.com/news/top-10-summer-tips.aspx it is currently recommended that departing passengers arrive at LAX 2 hours prior to scheduled ***boarding*** (***not departure***) time for domestic flights and 3 hours prior to scheduled ***boarding*** (***not departure***) time for international flights. Thus, these total recommended times will now be almost 3 hours for domestic flights and almost 4 hours for international flights for those passengers using shared ride vans, hotel shuttles, rental cars, commercial off-airport parking facilities, or public transportation, including LA Metro trains or your FlyAway service. This must be stated in all LAWA LAMP documentation and ultimately on the LAX website. P.4-11

See http://thesource.metro.net/2014/06/26/metro-board-approves-new-station-at-aviation96th-as-best-option-to-connect-to-lax-people-mover/ for a sample of comments, e.g., Comments 1, 13, and 25, by others of the inadequacy of the proposed CTA 3-station spine APM configuration. Then there is Comment 46 wondering why the APM is not routed to the Aviation/Imperial station, thus eliminating the need for the LA Metro W. 96th Street LAX Station. Of course, this is consistent with my suggestion of routing the APM over Manchester/Firestone to the Blue Line Firestone, thus providing a ***one-seat service*** to and from Downtown LA and Union Station. P.4-12

Considering that the projected LAMP cost is over $5 Billion, this would be a relatively small percentage cost increase, particularly if this added cost is split with LA Metro. In particular, per http://thesource.metro.net/2016/12/01/final-study-approved-for-transit-station-to-connect-metro-rail-to-lax/ it is reported that LA Metro will spend approximately $600 Million to build the W. 96th Street/LAX station complex. If, instead, this $600 Million were spent on extending the APM to the Blue Line Firestone Station, this may attract more than the paltry 0.7% projected traffic for the LAX station. As noted above, the JFK AirTrain carries 11% of JFK traffic via ***two*** offsite stations that connect it directly to subways and the LIRR for ***one-seat service*** to Queens and Manhattan. Why not LAX?

Other germane comments can be found in http://thesource.metro.net/2014/06/16/metro-staff-recommends-new-light-rail-station-at-aviation96th-street-to-connect-to-future-lax-people-mover/ , http://thesource.metro.net/2013/10/09/connecting-metro-rail-to-los-angeles-international-airport-here-is-a-look-at-issues-currently-on-the-table/, and one by Y Fukuzawa in http://thesource.metro.net/2011/03/23/study-on-better-connecting-lax-to-metro-rail-to-be-considered-by-metro-board/ "One thing they could do right now is to start consolidating the redundant shuttle buses that clogs up the traffic at LAX. You have a shuttle bus that goes to the Parking Spot in Century and another shuttle bus that goes to Hilton LAX right next door to it. And these shuttle buses make stops at every terminal, yet you cannot use them as terminal connections because there's another shuttle for that. All these redundant buses add up to more traffic which otherwise could just be consolidated into one longer bus". P.4-13

Then there https://www.thetransportpolitic.com/2012/03/09/for-l-a-how-to-build-an-airport-rail-connection-that-makes-sense-for-passengers/ in 2012 which discussed several options to both LAWA and LA Metro on improving access to LAX. On commenter's suggestion was to route the APM not only to ***all terminals*** (my emphasis) and the CONRAC, but also to key hotels in the immediate vicinity of LAX. Thus, it is obvious to yours truly that there are many persons besides myself out there who are well informed and thus have very good ideas that need to be explored and evaluated.

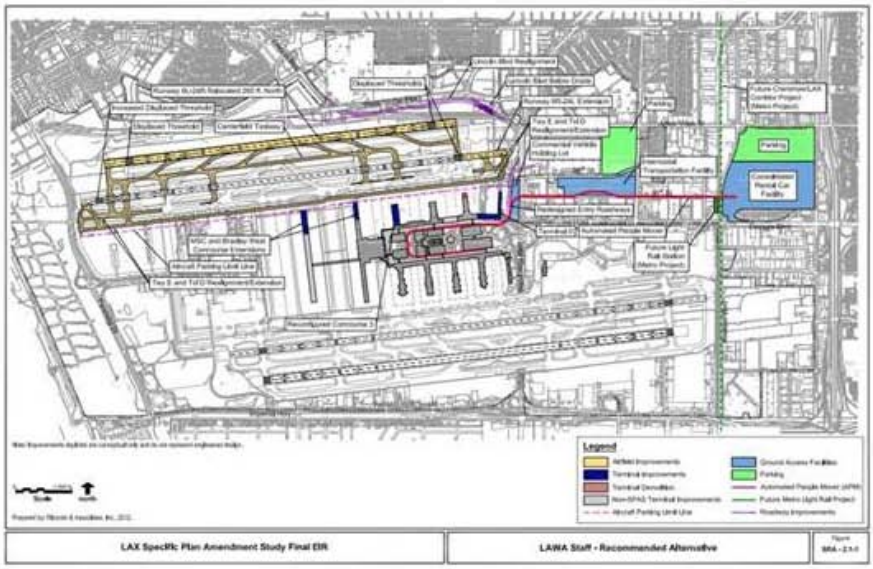
(On a minor point, for the one CTA station option, headways would need to be *decreased*, not *increased* to accommodate the increased passenger load. By definition, headway is the reciprocal of frequency. Lower headways mean more trains per hour.) P.4-14

Admittedly, having an APM station at each terminal would increase APM travel time. However, the added walking time would now be zero and thus the ***total travel times*** would obviously be less than those associated with the 3-station spine configuration.

Table 3-1, "Build" Alternatives Summary -- Nowhere do you mention that Figure SRA-2.1-1 "LAWA Staff - ***Recommended*** Alternative" of the Specific Plan Amendment Study (SPAS) (reproduced below) included construction of a Terminal 0 and recommended a hook configuration for the CTA APM serving Terminals 0-8, with between 3 to 5 stations within the APM. It also showed the APM routed over P.4-15

Comment Letter P.4
Page 5 of 10

W. 98th Street and a single Intermodal Transportation Facility or ITF. It also assumes the construction of a Century Blvd. Station on the LA Metro Crenshaw/Green Line. This station will still be built but with an additional station at W. 96th Street. All current LAMP documentation must address in detail these differences from previous recommendations and the rationale for deviating from them.



These differences between the SPAS and the LAMP are conveniently not shown on Figure 3.3 or discussed anywhere in the subject report but definitely should be for the sake of completeness. Perhaps they conveniently are not, as they would simply raise the questions that I and numerous other commenters have raised.

P.4-15

Paragraph 3.2.7.1, APM Alignment -- Here you mention that the APM would be routed along W. 96th Street instead of along W. 98th Street as recommended in the SPAS. If W. 98th Street was OK then it should be OK now. To me, having the APM perpendicular to the LA Metro station and the station offset to the east is far less convenient for passengers than having the station directly above the LA Metro station which would be possible with a W. 98th Street alignment. This would be similar to the arrangement between BART and the SFO AirTrain, and could even induce more LA Metro patrons to use the rail station vs. the paltry 0.7% estimated by LA Metro.

P.4-16

Paragraph 3.2.7.2, Intermodal Transportation Facilities (ITFs) -- Since the two ITFs are essentially identical and provide essentially identical services, I feel that one planned ITF, say ITF-East, should simply be a conventional off-CTA parking structure. (Note that the SPAS also recommended a single ITF). In particular, I note that both ITF-West and ITF-East are planned to accommodate public transit buses. This is redundant, as this service will also be provided by the bus plaza adjacent to the LA Metro W. 96th Street Station. Thus, arriving passengers not that familiar with LAX would be thoroughly confused as to which of the THREE (including the LA Metro bus plaza) to use to complete their journey. In short, this paragraph does not adequately provide the justification for having ***three*** essentially identical facilities.

P.4-17

In passing, your Figure 2.4 shows only ITF, not two. I note too that Table 3.1 gives no credit to the SPAS having only one ITF and instead did not consider the obvious addition of a conventional multi-level off-CTA parking structure. Thus, LAWA set up a straw-man they could shoot down to justify having redundant ITFs.

In this paragraph, you also state that the ITFs ***may*** include baggage check facilities and ticketing kiosks to make these facilities convenient alternatives to the CTA. To give LAMP any chance of success, these

P.4-18

facilities, along with Sky Cap Service, MUST be provided at ALL ITFs, the CONRAC, and the W. 96th Street LA Metro station. Similar services ***must*** also be provided at all baggage claim areas so that the passengers will be unencumbered with baggage at both ends of their journeys. This must be addressed in all LAMP documentation. P.4-18

Paragraph 3.2.7.3, CONRAC Facility -- My only problem here, again, is very inconvenient access to the CTA. My guess here is that the major rental car agencies will establish "work arounds" to save their customers the 14 to 20-minute delays and long walks associated with getting to and from the CONRAC. P.4-19

Paragraph 3.4 and Table 3-6 - Evaluation Results

A. *Would the Alternative Improve Access Options and The Landside Travel Experience for Passengers?*

A-1, for Paragraph 3.4.3 Use of Other Airports Alternative. Here I suspect that by making LAX less convenient for those passengers now denied the unrestricted curbside access they currently enjoy, such as those using shared ride van services, they may very well be tempted to use LGB, BUR, ONT, or SNA, even if the fares are higher. I know that this would definitely be my preference for domestic flights. Since I live in Huntington Beach, either SNA or LGB or even ONT would be my airport of choice for any flight, even international, since I can reach SFO, DFW, ATL, or JFK from SNA or LGB. Note too that BUR is currently building a new terminal to replace the one originally constructed on the 1930s. P.4-20

A-2, for Paragraph 3.4.7, Proposed Action Alternative. The proposed action would most likely enhance access options and the landside travel experience ***but only for*** those passengers who currently arrive at and depart from LAX in private automobiles, as there should be less CTA congestion, at least in the short term. ***However***, this cannot be said for those who currently use shared ride vans, hotel shuttles, public transit, and even your LAWA FlyAway service, because now these passengers will have to endure an additional 14-minute average, or maybe 20 minutes or more, APM plus walking time vs ***zero time*** and ***zero additional walking distance*** today.

This will be especially inconvenient for those passengers with several pieces of luggage, traveling with small children, and those, such as yours truly, with mobility issues. Those using the LA Metro W. 96th Street Station will not be immune from this additional travel time. In particular, those using LA Metro from Union Station or Downtown LA will have to transport their luggage up or down an elevator and walk some distance at both ends to make the Blue-Green Line transfer at Rosa Parks. In addition, based upon current LA Metro timetables, this trip will take over an hour from Union Station or downtown LA because of uncoordinated Metro timetables for the Blue and Green Lines. As noted above, the trips between JFK and Manhattan take approximately 25 minutes using the LIRR or 40-60 minutes if using the subway. P.4-21

I suspect the LAWA engineers already know this, but in case they don't, the JFK AirTrain is discussed at https://www.panynj.gov/airports/jfk-to-from.html. There is also a YouTube video of an AirTrain ride at JFK at https://www.youtube.com/watch?v=O8-SoGXU9H8. Another YouTube video at https://www.youtube.com/watch?v=kG64kC8XIR8 shows how to use the JFK AirTrain and subway to reach Manhattan. Finally, there is a YouTube video at https://www.youtube.com/watch?v=nqdnRFWh93E which shows how to use BART at SFO. LAX really needs this to do the job right.

I am still waiting for ***documented proof*** that adding 14 to 20 minutes and long walks will enhance the travel experience of those passengers negatively impacted by LAMP. So far not a word from anyone at LAWA about how to accommodate these impacted passengers at LAX. Without such proof, the honest answer to this question must be **NO!** for all alternatives, even the Proposed Action Alternative

B. *-Would the Alternative Provide a Direct Connection to The Metro Rail and Transit System?* Obviously, it goes without saying that this would be positive for all alternatives ***assuming*** the APM serves each LAX terminal **and if** the APM station is located directly above the LA Metro rail station. However, forcing the LA Metro patrons walk longer distances just to get to the APM station plus the additional 14 to 20-minute APM travel time plus additional walks decreases the desirability of this option. If not, as before, the honest answer to this question must be **NO!** for all alternatives, even the P.4-22

Comment Letter P.4
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Proposed Action Alternative.

Please note too that the ITF-East APM station is distinct from the CONRAC APM Station. P.4-22

C. *Would the Alternative Improve Connectivity and Mobility for Airport Passengers, Visitors, And Employees?* -- Obviously this is true only for those passengers arriving or departing LAX in private automobiles, but not for all passengers. This would be true ***only if there were only one ITF and if it as well as the CONRAC and LA Metro W. 96th Street Station were connected directly to each CTA terminal via the APM***. If not, as before, the honest answer to this question must be **NO!** for all alternatives, even the Proposed Action Alternative. P.4-23

D. Would the Alternative Be Feasible to Construct Within the Physical Constraints of The Airport Environment? I admit that constructing the APM to have stations immediate adjacent to the various terminals will obviously have several negative and significant impacts because of the existing two-level roadway. As you already know, the present LAX layout was initially conceived in the 1960s with only the lower roadway, with the upper roadway constructed in 1980 in anticipation of the 1984 Olympics. It is obvious now that LAWA made the wrong choice in 1980 when it chose to construct the upper roadway in lieu of an APM.

In essence, LAWA is now admitting this mistake but also compounding it by developing a LAMP that apparently prohibits those vehicles carrying several passengers in favor of those vehicle carrying only one, or maybe two, passengers. It should be noted that by 1980 several major US and International airports had already installed an APM and thus the technology was available. Instead, LAWA adopted the **Automobiles YES, Mass Transit NO!** philosophy that even now is obviously evident as the unstated underlying design basis for the LAMP project. P.4-24

The primary adjective of LAMP should be to enhance the experience of ***all passengers***, and not just a percentage of them, irrespective of their share of the total. In previous LAMP documentation, LAWA expresses that one objective of LAMP is to "*Enhance **passenger experience** by providing new options for pick-up and drop-off at the airport*." This has been reworded to say, "*Improve Access Options and The Landside Travel Experience for Passengers.*" At least LAWA does not have the audacity to add ***all*** in front of ***passengers***. These "new and improved" access options for pick-up and drop-off" ***are definitely not optional but are, in fact, mandatory*** for a significant fraction of LAX passengers whose overall experience will definitely be degraded, a fact conveniently never mentioned or admitted to in any LAWA LAMP documentation.

To be honest, LAWA should own up to this and offer alternatives for these adversely affected passengers, such as providing free shuttle service to and from the terminal curbsides irrespective of off-CTA origin or destination or how they travel to and from LAX. These shuttles would, on each trip, serve all off-CTA parking facilities, the CONRAC, the one-and-only ITF, the W. 96th Street LA Metro station and all CTA terminals in a circular route. P.4-25

This would result in only one shuttle bus line carrying many passengers in lieu of several shuttles, and probably reduce CTA congestion and possibly even make the building of an APM moot. As noted in one comment in http://thesource.metro.net/2011/03/23/study-on-better-connecting-lax-to-metro-rail-to-be-considered-by-metro-board/, a multiplicity of shuttle buses instead of a single shuttle bus route contributes to the CTA traffic congestion, and consolidating the numerous shuttles into one route could help alleviate this congestion even without the LAMP or APM.

With the prospects of increased airline traffic coincident with the 2028 Olympics, LAX must make its facility as convenient as possible for ***all passengers and just not for some***, and the 3-station APM alignment with only three CTA stations and long walks falls woefully short when it comes to enhancing the convenience of ***all passengers***. This will be apparently obvious in 2028 when a large percentage of LAX passengers probably unfamiliar with LAX will be obliged to add an additional 14 or more minutes to their trip only for the "honor" of enduring walks of to 1,000 feet going to and from their terminals. P.4-26

That is why I, and numerous other commenters, have suggested replacing the upper roadway with the APM. As noted by others, due to the relative closeness of the terminals, LAWA could probably get by

with six CTA APM stations, (T1.5, T2.5, T3.5/TBIT, T4/5, T6, and T7/8), even though this would introduce some additional walking that could be alleviated by moving sidewalks. Since T3.5 appears redundant to T2.5 now that Delta Airlines occupies Terminals 2 and 3, the T3.5/TBIT APM station could be immediately adjacent to the TBIT. (As noted above, it appears now that the T3.5 is redundant and perhaps is not really needed.) Also, since American Airlines now occupies Terminals 4 and 5, perhaps a Terminal 4.5 could be constructed and served by a single APM station as noted. P.4-26

I take particular exception to your selecting W. 96th Street for the APM route vs W. 98th Street as recommended on Figure SRA-2.1-1 in the SPAS. This is because I contend that the APM station platforms should be parallel to and directly above the LA Metro rail station platforms to maximize passenger convenience, something that is sorely lacking in the present LAMP design. Using the "Street View" option of Goggle "Earth," I concur that W. 96th Street is generally wider than is W. 98th Street. However, W. 96th Street curves south to become Bellanca Avenue, and the APM would have to be dog-legged around a large building and routed across a parking lot before reaching Aviation Blvd and the LA Metro Crenshaw Line right-of-way. Also, there is considerable on-street parking on both sides of W. 96th Street that could be adversely impacted by the APM.

On the other hand, even immediately west of Bellanca Avenue, W. 98th Street does appear wide enough to support an elevated APM supported by single columns in the center of the street without adversely impacting traffic or the adjacent buildings, considering there would not be any stations and minimal on-street parking along this portion of the route. Alternately, the APM support columns could be on the sidewalks, thus leaving the street open to automobile traffic and on-street parking.. P.4-27

In addition, it appears that the buildings on the south side of W. 98th Street all have vehicle entrances on W. 98th Street, while on the north side, including two buildings that have off-street loading docks, there is essentially only off-street parking. Thus, none of these facilities appear to require on-street loading facilities. In addition, there are alleys alongside and behind all these buildings, all of which are accessible from W. 98th Street that could be used for such access. In addition, there are numerous no-parking signs on both sides of 98th Street that prohibit on-street parking and loading and unloading, in contrast to the situation on 96th Street on which on-street parking is permitted.

East of Bellanca Avenue, the only obstruction to using W. 98th Street appears to be a surface parking lot for WallyPark, a commercial airport parking vendor. Thus, it appears that the APM support columns could be implanted in this lot with minimal modifications. Immediately east of this parking lot is the former Santa Fe (now BNSF) Harbor Subdivision right-of-way that will soon become the Crenshaw/Green Line right-of-way, thus permitting an APM left turn from W. 98th Street and thus be directly above the Crenshaw/Green Line and parallel to and directly above the W. 96th Street/LAX Station platforms. Thus, I see distinct advantages and no "showstoppers" associated to routing the APM over W. 98th Street in lieu of over W. 96th Street.

E. Will the Alternative Maintain Access to And Within the CTA And Passenger Terminals?

Obviously an APM replacing the upper roadway and serving all terminals will have a major impact during construction but should improve the access to and within the CTA and passenger terminals once operational. That is why I suggest a staged construction process, where the single ITF, the CONRAC, all off-CTA parking structures, and the LA Metro Station all be fully operational before any APM-related demolition and construction is started. While the upper roadway is demolished and the APM constructed, free frequent shuttle service would be provided between all CTA terminals and the various external facilities. In addition, the north and south CTA portions would be worked on individually, with the cross-CTA roadways used to access the terminals being impacted by adjacent construction. As is true for all major projects, "Where there is the will, there is a way". P.4-28

It must be noted here that the demolishment and reconstruction of the Terminal 3 Concourse will obviously have a significant negative impact of airport operations during construction. In Paragraph 2.5 of the Terminal 2/3 DEIR, LAWA admits this and states that this would be mitigated by "phased gate closures and shuttle transportation of passengers and employees." To me this statement is insufficient and needs to be fleshed out. In particular, what terminal gates will used when Terminal 3 gates are unavailable. Will passengers be transported to other terminals, including those on the south side of the P.4-29

CTA? How will well-wishes learn where to pick up their party? Will these shuttles be similar to those at IAD, or will passengers have to descend and climb stairways to move between the terminal and their airplane? Same with transfers to and from the Midfield Satellite Concourse. Unfortunately, this was not addressed in any comments or responses in the T2/T3 Final EIR. We need more thinking when it comes to reconsidering the route of the APM within the CTA. P.4-29

F. Does the Alternative Enhance Efficiency and Alleviate Delays and Congestion of On-Airport and Surrounding Roadways? The apparent assumption that the LAMP provisions of alternative drop-off and pick-up points will induce some travelers formerly accustomed to curbside access to use these various points is very unrealistic, especially if this increases the travel time and requires more walking for those who choose this option. I don't think that a significant portion of departing and arriving passengers currently using private automobiles will choose to be dropped off or picked up at an ITF only to have to arrive as much as 20-30 minutes earlier and walk considerable distances. If this is in fact the case, and with no supporting documentation provided to prove otherwise, the honest answer to this question must be, as before, **NO!** for all alternatives, even the Proposed Action Alternative. P.4-30

In short, for ***any major transportation project***, which the LAMP essentially is, the overriding success criterion should be that it benefits ***all those who choose to use the new facility without any detrimental impact*** on those who ***for any reason*** cannot use or choose not to use the various new facilities. There obviously can be winners, but ***there must be no losers***. If this criterion is not satisfied, the project must be deemed a potential failure, and partial success at the expense of others is not a valid reason for proceeding with a major $5+ Billion transportation project.

Paragraph 4 - Affected Environment, and Paragraph 5 - Environmental Consequences

This comment also applies to Appendices F, J, K, and L. Since I am not an environmental engineer, I cannot comment on specific items in this paragraph or the various related appendices. However, any estimates of the impact of the LAMP must assume that all private automobile traffic currently using the CTA will persist as the LAMP is developed as currently envisioned and will increase in time as the LA area population and the demand for air transportation increases such as during the 2028 Olympics. P.4-31

In short, it is unrealistic to assume that somehow some of those passengers currently served by well-wishers will somehow chose to be dropped off or picked up at an ITF. (This analysis should also reflect the possible deletion of one ITF and its replacement by a conventional parking structure.) In addition, this analysis should assume that some passengers using various off-site facilities will be accommodated in the CTA, as various commercial facilities develop work-arounds to transport their customers to and from the terminal curbsides. It should also assume that some passenger traffic to and from the LA Metro Station and the ITF(s) will use a TNC vehicle (Uber or Lyft) in lieu of the APM.

Also, should the APM be routed to serve each terminal as it should be for maximum passenger convenience, the Construction and Visual Impacts of Paragraph 5.5.3.2 will obviously have to be revised. In contrast. if the spine APM configuration is selected, the impacts of the various passages will still need to be revised due to the construction of Terminals 1.5, 2.5, 3.5 and perhaps 4.5. In particular, Figures 5.8 and 5.9 show clearly the eyesore that the proposed APM spine routing will be. In passing, it should be noted that routing the APM above the lower roadway to serve the individual terminals will leave the Theme Building unaffected. A definite plus. P.4-32

Paragraph 5.3.6.2.2, *Construction and Operational Impacts on the* City *of Los Angeles* - Has the City of Los Angeles been notified on the potential impacts on Mobility Plan 2035? P.4-33

Table 5-35 -- This table should be revised to include Terminal 2.5 and, perhaps, Terminal 3.5, as these terminals will impact the design and usage of the APM and passages. P.4-34

As for airside access, I realize that the LAMP only addresses landside access. However, according to several comments in a recent Skytrax passenger satisfaction survey, the lack of interterminal airside access was a factor in downgrading LAX. I note that, in a March 16, 2017, Press Release, LAX P.4-35

"boasted" that Los Angeles International Airport (LAX) has been named one of Skytrax's 2017 "Top 10 Most Improved Airports." However, this LAX Press Release also correctly noted: "Out of 100 top airports, LAX moved from No. 91 to No. 86", with the 10th best improvement in overall ranking. I don't want to sound cynical, but to me going from Number 91 to Number 86 is like a kid bragging to his parents about his overall report card grade improving from a ***C-Minus*** to a ***C***.

To add my two cents here, improved airside access should be part of any LAX modernization project, as the two-combined affect the passenger experience, even if only 25% of airport users are impacted. In the Skytrax report, several comments were to the effect that landside and airside access modernization environmental impacts cannot be separated but must be addressed as part of a total package. Note that ATL and IAH have both landside and airside APMs.

I am fully aware that the present CTA terminal arrangement makes it very expensive to improve landside and airside access. Those US airports with superior ground access such as JFK, IAH, PHL, ATL, SFO, etc., are more spread out and thus more suited for an APM that serves each terminal individually. Also, they don't have parking structures within the terminal area as does LAX. However, does starting with a design such as at LAX preclude not doing everything possible to improve access? I think not. Again, "If there is a will, there is a way". P.4-35

As for the future, the much-maligned LGA (La Guardia) is currently undergoing a complete renovation, including new terminals ***and*** the construction of an AirTrain similar to that at JFK connecting LGA to a subway station that will provide *one-seat* rail service to and from Manhattan. Assuming these LGA projects do what they are supposed to do, it would not be a surprise if LGA joins JFK, SFO, ATL, IAH, DEN, DFW, etc., in outranking LAX in overall customer satisfaction in 2023 and later. EWR (Newark) and ORD (Chicago) are getting new APMs, and both airports could conceivably rank higher than LAX in future years. Such an occurrence would be unflattering to those responsible for the LAMP design.

Despite its stated goal of achieving World Class status, LAX may most likely become "***world famous***" and "***noteworthy***" for its ***unique design features*** such as:

- ***Having an APM that does not serve each terminal individually***, thus requiring excessively long walks, with no mechanized alternative for a significant percentage of airline passengers
- ***Not having direct one-seat rail passenger rail access service*** to and from the respective downtown area
- ***Having multiple Intermobile Transfer facilities*** causing confusion among arriving passengers as to which one they should use to complete their journey
- ***Nonexistent airside transfer facilities*** (DFW has an airside APM with 2 stations in each terminal, while ATL and IAH have both landside and airside APM systems.) P.4-36

I trust the LAX does not want such notoriety, but I fear that these could be factors in future customer satisfaction evaluations of LAX.

Beautiful Dreamer -- If there ever was a term to describe LAWA's hopes for the LAMP, these two words apply. If LAWA engineers think that passengers arriving at or departing from LAX will prefer being dropped off at a remote location and enduring long walks to being dropped off or picked up at terminal curbsides, this really applies.

As I learned in a 40-plus years career as an Aerospace Mechanical Engineer, one must never "Make Vast Plans with Half Vast Ideas."

Another slogan we had was "We never have the time or the money to do the job right in the first place, but plenty to do the job over."

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Responses to Comment Letter P.4

Response P.4-1

To assist the public in locating the Draft EA and Draft General Conformity Determination document, the main page of the connectinglax.com website (http://connectinglax.com/index.html) includes a blue tab on the top titled "Draft Environmental Assessment Here" which when clicked, takes one directly to the document. The connectinglax.com website is organized to provide separate sub-pages for the California Environmental Quality Act (CEQA) documents (including the Draft EIR and Final EIR) and the National Environmental Policy Act (NEPA) documents (including the Draft EA and Draft General Conformity Determination) for the LAX Landside Access Modernization Program as the requirements and documentation for these processes are different. Therefore, a folder structure was used to organize the documents by process instead of one large repository.

Response P.4-2

As part of the CEQA process, Mr. Mastroly submitted multiple comments on the LAX Landside Access Modernization Program Final EIR in January and February of 2017. Responses to these comments were included in the City Council File Staff Report for the LAX Landside Access Modernization Program (http://clkrep.lacity.org/onlinedocs/2017/17-0276_misc_05-12-2017.pdf) and were directly mailed to Mr. Mastroly. The CEQA environmental review process concluded in June 2017. LAWA received Mr. Mastroly's comment letter on July 14, 2017; however, the letter specifically stated that it did not address any environmental issues and, therefore, was not evaluated as part of the environmental review process. Furthermore, the CEQA environmental review process concluded in June 2017, prior to Mr. Mastroly's July 2017 letter.

Response P.4-3

The comment is noted. Please see Responses to Comments P.4-4 through P.4-36 below.

Response P.4-4

The recirculation ramps allow vehicles to traverse from the lower level to the upper level roadway system, or vice versa, to allow vehicles to change levels and go back through the CTA roadway system without exiting the Airport. As proposed under the Proposed Action, the demolition of the recirculation ramps would prevent these current movements; vehicles that need to change levels and recirculate through the CTA would instead be forced to exit the Airport and re-enter the Airport roadway system to get to the desired level. However, vehicles that are on the departures level would be able to recirculate to the departures level; similarly, vehicles on the arrivals level would be able to recirculate to the arrivals level. This language has been added as a footnote to Table 1-2 in the Final EA for clarification.

Response P.4-5

The proposed APM guideway and columns can be constructed along W. 96th Street without impacting adjacent property and buildings, but cannot be constructed along the same stretch of W. 98th Street without impacting adjacent property and buildings. The existing road and right-of-way width along W. 98th Street between Airport Boulevard and Bellanca Avenue is narrower than the existing road and right-of-way width along the same stretch

of W. 96th Street. Per the City of Los Angeles Mobility Plan, W. 96th Street was designated as an Avenue III roadway classification, which requires a right-of-way 72 feet wide and roadway of 46 feet wide.[2] However, the Mobility Plan was amended to downgrade W. 96th Street in this area to a Collector Street. Construction of the APM columns can be accomplished within the existing right-of-way and still provide a roadway right-of-way of 66 feet and street width of 40 feet, which are the dimensions for a Collector street per the City of Los Angeles Mobility Plan. This can occur along this segment of W. 96th Street, without significantly impacting the surrounding businesses.

The similar stretch of W. 98th Street (between Airport Boulevard and Bellanca Avenue) is already designated a Collector street in the City of Los Angeles Mobility Plan; there is no room to construct the APM columns along W. 98th Street in this area without either acquiring additional property and buildings or impacting the roadway width, which is needed for vehicle traffic and for loading and unloading of materials and supplies for the hotels and businesses located on either side of the street.

Response P.4-6

As stated in Response to Comment P.4-5 regarding an APM alignment along W. 98th Street, there is no room to construct the APM columns along W. 98th Street in this area without acquiring considerable property and impacting buildings or impacting the roadway width, which is needed for vehicle traffic and for loading and unloading of supplies and materials for the hotels and businesses located on either side of the street.

The commenter suggests that the best location for the ITF East APM Station is immediately above the proposed Metro AMC 96th Street Transit Station. However, shifting the ITF East APM Station west over the proposed Metro AMC 96th Street Transit Station would put the APM Station farther away from passengers and employees who choose to utilize the ITF East to access the APM. It is impractical to have two APM stations (separate stations for the ITF East and the AMC 96th Street Transit Station) because the distance between the two facilities is too close; rather, LAWA has designed the ITF East APM Station to be located between the ITF East and the AMC 96th Street Transit Station. Passengers and employees utilizing Metro transit trains or Metro buses to transfer to the APM would be able to take escalators or elevators up to the APM level, and access the APM walkway to cross Aviation Boulevard into the ITF East APM Station.

Response P.4-7

Response to Comment P.5-13 explains the assumptions underlying the percentage of passengers expected to use the various LAX access points (ITF East, ITF West, CONRAC, and CTA) under the Proposed Action Alternative. The underlying purposes of the LAX Landside Access Modernization Program are to improve access to LAX and relieve congestion on Airport and surrounding roadways and to provide access options for passengers and employees. The Project would relieve congestion by developing a flexible transportation system that provides alternatives to the Central Terminal Area (CTA) for passengers, Airport and other employees, and Airport-related vendors accessing LAX. As the commenter states, users of the APM would have some walk distances between the APM stations to the passenger terminal facilities and the proposed ground transportation facilities outside of the CTA. However, moving walkways would generally be provided for any walk distance greater than 200 feet to assist pedestrians. The walk distances may deter some passengers (such as those with impaired mobility, large baggage loads, less-mobile children) from utilizing the APM. However, the time certainty, ease of access

[2] Los Angeles Department of City Planning, *Mobility Plan 2035, An Element of the General Plan*, adopted by City Council: September 7, 2016.

to the proposed ground transportation facilities, connection to the regional mass transit system, and potential price differential for parking outside of the CTA would entice many other passengers and employees to utilize the APM. The traffic modeling assumes some passengers would continue to use curbside drop-offs, pick-ups and parking in the CTA. As noted in Appendix E, Section E.2.3, screening of the CTA APM station alternatives examined constructability, maintenance of access/Airport operations, APM operations, and pedestrian walk distances between APM stations and the terminals. Based on industry design practice and experience, pedestrian walk distances over 1,320 feet (a quarter mile) between an APM station and terminal, even with the use of moving walkways, was identified as being too far and inconvenient for passengers thus, alternatives that had walk distances over 1,320 feet were eliminated from consideration.

Under the Proposed Action, passengers would have the opportunity to utilize the APM to access the CTA from the CONRAC, ITF East or ITF West. With implementation of the Proposed Action, passengers within the CTA would have additional options that do not exist today for being picked-up or dropped-off, and exercising any of those options at any level would reduce congestion that would otherwise occur within the CTA under the No Action Alternative.

As noted in Table 5-35 in Section 5.12, Cumulative Impacts, the EA assessed Terminal 1.5, the Terminals 2 and 3 Modernization Project (which includes what used to be called Terminal 2.5) and the Terminal 3 Connector as cumulative projects. Part of the intent of Terminal 1.5 and the Terminals 2 and 3 Modernization Project is to consolidate security checkpoints and passenger processing for airlines utilizing Terminals 1, 2, and 3. The proposed check-in and baggage facilities to be incorporated as part of the Terminal 1.5 project would supplement the existing Terminal 1 facilities, although some existing check-in facilities may be relocated. Similarly, the Terminal 2 and 3 Modernization Project would provide increased check-in and baggage facilities at the Terminal 2.5 ticketing building. The Terminal 3 Connector would provide a connection between Terminal 3 and the Tom Bradley International Terminal, so that passengers could walk between these terminals without exiting security, similar to the recently completed Terminal 4 Connector.

Response P.4-8

Please see Response to Comment P.4-7 for a discussion of the purposes of the proposed LAX Landside Access Modernization Program, walk distances, and attractiveness of the proposed facilities to passengers and employees. The commenter believes that because the Proposed Action Alternative would not significantly reduce private vehicle traffic due to the walk distance issue raised in Comment P.4-7, the Proposed Action Alternative would not achieve a reduction in traffic congestion. However, because the use of the ITFs would reduce the time and cost associated with private vehicles using the CTA, the traffic analyses reasonably assume that many drivers would use the new choice. As discussed in Section 5.9.4.2.1, Tables 5-26, 5-27, and 5-28 of the EA, the Proposed Action Alternative would reduce traffic congestion within the CTA when compared to the No Action Alternative.

The commenter states that existing ground transportation providers will find ways to circumvent any policy changes that LAWA may implement to discourage certain users from driving into the CTA. Since 1987, LAWA has instituted a ground transportation permit program with rules and regulations, that authorize LAWA to execute Non-Exclusive License Agreements (NELA), and issue vehicle permits to operators of commercial vehicles transporting passengers to and from LAX. NELAs are routinely issued to qualified operators of Charter Party Carrier Transportation and Courtesy Vehicle Transportation Services, including TNCs such as Uber and Lyft, to and from LAX.

LAX is currently served by over 3,400 authorized Charter Party and Courtesy operators. In fiscal year 2014-15, more than 590 NELAs were issued. Each operator must satisfy all application requirements, which include applicable California Public Utilities Commission authority, City Business Tax Registration, LAWA Insurance, and Department of Motor Vehicles registration. Each operator is required to abide by all LAX Rules and Regulations while operating at LAX. LAWA also has concession agreements with Commercial Ground Transportation (CGT) vehicles, which include taxis, rental car agency shuttles, hotel shuttles, off-Airport parking shuttles, and shared ride vans, who must also satisfy similar requirements. It is unlikely that many passengers would be willing to wait for a TNC at the ITF to pick them up and pay the associated fees that TNCs are required to pay to enter the CTA to avoid riding the free APM. Additionally, passengers that choose to utilize the ITFs are doing so to avoid having to drive into the CTA, which is often congested and takes an extended period of time to enter via surface roads and get to the passenger terminals.

To reduce congestion on the CTA roadways, LAWA would update the LAX Ground Transportation Permit Program to allow and/or require commercial operators to pick-up and drop-off passengers at the ITF East and ITF West. In addition, if necessary in the future, LAWA may restrict access to the CTA for some commercial operators, and/or evaluate pricing differential strategies to encourage commercial vehicle operators to pick-up and drop-off passengers at the ITF East and the ITF West. Violators of LAX Rules and Regulations, including applicable NELA stipulations, would face revocation of their permit to operate at the Airport.

Response P.4-9

Please see Response to Comment P.4-7 for a discussion of the purposes of the proposed LAX Landside Access Modernization Program, walk distances, and attractiveness of the proposed facilities to passengers and employees. While walk distance is a factor that people will use to determine how they access the passenger terminals at LAX it is not the only factor. As discussed in Response to Comment P.4-7, it is reasonable to assume many travelers would avoid the extra time and congestion associated with accessing the CTA via surface roads. Response to Comment P.5-13 explains the assumptions underlying the percentage of passengers expected to use the various LAX access points (ITF East, ITF West, CONRAC, and CTA) under the Proposed Action Alternative.

Figure 1-2, LAX Landside Access Modernization Program Components, in Section 1 of the Draft EA depicts the configuration of the pedestrian walkways connecting the APM stations to the various terminals in the CTA under the Proposed Action. The pedestrian walkway extending north from the East CTA APM Station would connect to the east side of Terminal 1 and would serve passengers going to Terminal 1 and the future Concourse 0 (see Table 5-35 and Figure 5-12 in Section 5.12, Cumulative Impacts). The commenter is incorrect in alleging that "the East CTA Station will no longer serve Terminal 1 with construction of T1.5." T1.5 will be constructed between Terminal 1 and Terminal 2, and does not affect the ability of the East CTA APM Station to serve Terminal 1. The Center CTA APM Station would have two pedestrian walkways extending to terminals on the north side of the CTA; one to Terminal 1.5 and the other to Terminals 2/3. As noted in Response to Comment P.4-7, the Terminal 3 Connector is planned to provide a secure connection between Terminal 3 and the Tom Bradley International Terminal (TBIT), so that passengers do not have to exit security to move between the terminals.

The pedestrian walkways connecting the APM stations to Terminals 4, 5, 6, and 7 would be located to be convenient to passenger processing facilities within each terminal. Walk distances from the APM stations to each terminal were factored into the evaluation of APM alternatives, as documented in Appendix E of the EA. The Proposed Action includes moving walkways to assist passengers in traversing distances over 200 feet.

Response P.4-10

The transit ridership numbers utilized in the EA were developed by Metro and utilized in their analysis of the proposed Airport Metro Connector (AMC) 96th Street Transit Station. As noted on page 1-7 of the Draft EA, "[t]he proposed APM would consist of a fixed guideway transportation system that would provide free access to the CTA for passengers, employees, and other users of LAX, 24 hours a day." Operation of the Metro light rail trains is the purview of Metro; currently, the Green Line, which will be extended to the north to Metro's proposed AMC 96th Street Transit Station, operates between the hours of 4:00 a.m. and 1:30 a.m.

Note that Metro undertook an extensive alternatives analysis to determine how and where to provide transit service to LAX. Please see Metro's Final EIR for the proposed AMC 96th Street Transit Station.[3]

Appendix E of the EA focuses specifically on the alternatives evaluated for the APM system at LAX and how the Proposed Action alignment was selected.

Response P.4-11

The comment is comparing the walk time from passengers dropped-off at a terminal to those dropped-off at one of the APM stations located outside the CTA. This is an erroneous comparison. The travel time needs to include the time it takes for a passenger to get to the terminal once they exit off of Sepulveda Boulevard or Century Boulevard. This is one of the problems the APM is intended to help solve; providing time-certain travel for passengers to enter the CTA and get to their terminal.

Section 2.3 in Section 2, Purpose and Need, of the EA, identifies the need for the Proposed Action, which include:

- Need for improved access options
- Need for reduction of traffic congestion
- Need for shifting traffic outside of the CTA
- Need for transit connectivity
- Need to improve connectivity and mobility

As noted in that section, the reliance on a single access point into the CTA for all ground vehicles for passengers (including transit, private vehicles, taxis, TNCs, limousines, and shuttles) currently results in more time spent in traffic, uncertain travel times, more passenger hours traveled, congestion and delay in the CTA, as well as back-ups onto the surrounding local and regional roadway network.

Section 5.9.4.2.1, in Section 5, Environmental Consequences, of the EA, documents the on-Airport traffic conditions under the No Action Alternative and the Proposed Action Alternative. As shown in Table 5-27, traffic conditions in the CTA would considerably worsen under the No Action Alternative when compared to the Proposed Action Alternative. This would result in numerous delays and longer travel times for passengers to reach their terminal. Due to the traffic congestion that exists within the CTA today during peak hours, when traffic routinely backs up onto Century and Sepulveda Boulevards, it can take in excess of 30 minutes to drive through the CTA; by contrast, a ride on the APM would take approximately 9-10 minutes from end to end (CONRAC station on the east and the CTA West APM station on the west). As noted in Response to Comment

[3] Los Angeles County Metropolitan Transportation Authority, *Airport Metro Connector 96th Street Transit Station Final Environmental Impact Report*, November 2016. Available: https://www.metro.net/projects/lax-extension/amc-96th-st-feir/.

P.4-7, passengers would be able to choose how they access the terminals within the CTA and it is reasonable to assume many travelers will avoid the extra time and congestion associated with accessing the CTA. As also noted in Response to Comment P.4-7, users of the APM would have some walk distances between the APM stations to the passenger terminal facilities and the proposed ground transportation facilities outside of the CTA. However, moving walkways would generally be provided for any walk distance greater than 200 feet to assist pedestrians. While the walk distances may dissuade some passengers from utilizing the APM, the time certainty an APM provides, ease of access to the proposed ground transportation facilities, and price differential for parking outside of the CTA would entice many other passengers and employees to utilize the APM.

Please see Response to Comment P.4-10 for a discussion of Metro ridership projections and alternatives Metro considered. Please see Appendix E of the EA for a discussion of APM alternatives evaluated for the LAX Landside Access Modernization Program.

Response P.4-12

Please see Response to Comment P.4-10 for a discussion of Metro ridership projections and alternatives Metro considered. Neither FAA nor LAWA have decision making authority regarding where Metro will build its new station. Therefore, the EA relies upon Metro's planning and system expertise regarding the location of a new transit station for improved access to LAX. Please see Appendix E of the EA for a discussion of APM alternatives.

Extension of the APM to the Metro Blue Line Firestone Station would not be feasible. That would entail an extension of the system by over 6 miles, 3 times its current proposed length. Besides being cost prohibitive, LAWA would not be able to fund or operate such an extension as it would be off-Airport property and there is no direct Airport need for such an extension. LAWA is prohibited from spending airport funds on non-airport projects. A transit connection for transit purposes would need to be funded and operated by Metro.

Response P.4-13

LAWA is working with the various off-Airport shuttle providers to encourage consolidation of shuttles. For example, Joe's Parking and the Sheraton Hotel used to have separate shuttles, but now they have consolidated their shuttles. LAWA continues to evaluate opportunities and ways to reduce traffic within the CTA and will continue to do so.

Response P.4-14

Please see Appendix E for an evaluation of APM alternatives, including why having APM stations at each terminal within the CTA is infeasible and how walk distances were incorporated into the evaluation. As noted in Section E.2.3.6 in Appendix E of the EA, it would be impossible to construct an individual station for each of the 8 terminals within the CTA along a spine alignment, separately adjacent to each terminal. The required length for boarding/deboarding passengers at each APM station would leave nominal space between stations, as well as increase the total travel time as a result of the additional dwell time at each station. Therefore, this alternative option was considered infeasible. Also, please see Response to Comment P.4-11 for a discussion of the need for the Proposed Action.

Response P.4-15

Section 3.2.5.1, in Section 3, Alternatives, of the EA, notes, "[t]he APM analysis included assessment of vertical alignments, horizontal alignments, numbers of CTA stations, and multiple alignments east of the CTA. The

various APM options are discussed in detail in Appendix E. Inside the CTA, the APM for all three build alternatives identified in this EA are the same. The APM analysis determined an elevated alignment, down Center Way, with three stations would be the most feasible route through the CTA."

Section E.2.2 in Appendix E of the EA evaluated APM alignment alternatives including horizontal alignments. The only feasible horizontal APM alignment within the CTA is a spine alignment located along/above Center Way. All other APM alignments, including a loop alignment above the terminals or World Way, was determined to be infeasible due to the severe impact construction of such an alignment would have on the operations of the Airport.

The potential future construction of Concourse 0 is identified and assessed in Section 5.12, Cumulative Impacts, of the EA. As noted in Response to Comment P.4-10, Metro conducted their own independent alternatives analysis on the location and need for the proposed AMC 96th Street Transit Station. Finally, Section 3.2.6, Modified SPAS Alternative, in Section 3, Alternatives, of the EA describes how the SPAS alternative was modified for evaluation as an alternative.

Response P.4-16

Please see Response to Comment P.4-10 for a discussion of Metro ridership and Metro's independent alternatives analysis on the location and need for the proposed AMC 96th Street Transit Station. Please also see Response to Comment P.4-5 for a discussion on why an APM alignment down 98th Street is infeasible. Although the SPAS conceptual alternative included an APM alignment down W. 98th Street, additional project-level planning and analysis conducted by LAWA as part of the proposed LAX Landside Access Modernization Program determined that there is no room to construct the APM columns along W. 98th Street between Airport Boulevard and Bellanca Avenue without either acquiring additional property and buildings or impacting the roadway width, which is needed for vehicle traffic and for loading and unloading of materials and supplies for the hotels and businesses located on either side of the street.

Response P.4-17

Please see Response to Comment P.4-11 for a discussion on the need for the Proposed Action. As noted in Section 1, Introduction and Background, of the EA, both the ITF West and ITF East would have public parking garages, as well as areas for buses and shuttles to pick-up and drop-off passengers. The ITF East has the ability to accommodate long-distance transit buses. The ITF West can also accommodate buses.

As stated in Section 2, Purpose and Need, of the EA, one need is to provide options for passengers and employees to access the CTA. The ITF West is envisioned to potentially attract passengers and employees that are traveling from the north and south along the Sepulveda Boulevard/Lincoln Boulevard corridor, while the ITF East is envisioned to potentially attract passengers and employees that are traveling from the east and from I-405. The need for the two ITF facilities is to provide passengers convenient options for accessing the APM, in order to encourage them not to drive into the CTA. By placing APM stations near major routes prior to the CTA (in other words, people would have to drive past these facilities on their way into the CTA), they could decide to either park or be dropped-off at the ITF West or the ITF East and use the APM rather than continue into the CTA. Based on the alternatives analysis conducted by LAWA as part of the proposed LAX Landside Access Modernization Program, a single ITF would involve more miles traveled and would not be as effective for reducing traffic congestion.

There is no basis to assume there would be substantial driver or passenger confusion related to the ITF East, ITF West, and Metro's AMC 96th Street Transit Station, which is not a component of the proposed project. Signs would be provided on critical access routes to direct vehicles to the closest ITF and CONRAC. LAWA has been working to improve driver signs and directions, and would provide clear and prominent wayfinding as part of the LAX Landside Access Modernization Program.

Figure 2-4 was prepared by Metro to show their plans for the Crenshaw/LAX Line and their proposed AMC 96th Street Transit Station. The figure has been corrected in the Final EA to show both the ITF West and ITF East included in the Proposed Action.

Response P.4-18

As discussed in Section 3.2.7.2 of Section 3, Alternatives, of the EA, each ITF "would be designed to include airport amenities, which may include valet parking, waiting areas, commercial amenities such as dining and concession services, baggage check facilities, and ticketing/information kiosks to make these facilities attractive and convenient alternatives to the CTA." Some of these amenities may be available when the ITFs open, while other amenities such as baggage check-in facilities may not occur until future years and is subject to FAA and TSA approvals. The logistics of providing remote baggage check-in facilities that will deliver checked bags to the proper terminals and airline gates prior to aircraft departures require additional planning and approvals to ensure efficiency and security, particularly from multiple remote locations. LAWA is continuing to study the feasibility of providing this service but cannot at this time commit to making it available. Contrary to the comment, the provision of remote baggage check-in facilities is not a requirement or critical to the success of the LAX Landside Access Modernization Program. Remote baggage check-in remains quite rare in the United States and is not an impediment to successful APM and transit systems, for example at airports such as San Francisco International, Chicago O'Hare International, Chicago Midway International, Denver International, Salt Lake City International, Seattle-Tacoma International, JFK-New York, Newark Liberty International, Minneapolis International, and Reagan National. It should also be noted that the APM train, stations, and elevators providing access to the APM would all be designed to accommodate luggage carts. Many passengers would choose to use the ITFs and APM to avoid congestion, uncertainty, longer trips and costs associated with accessing the CTA.

Response P.4-19

Please see Response to Comment P.4-8 for a discussion of the ground transportation permit program and the rules and regulations that operators of commercial vehicles transporting passengers to and from LAX must comply. Please also see Response to Comment P.4-11 for a discussion on the need for the Proposed Action. Consolidated rental car facilities have been successfully implemented at large U.S. airports and have eliminated car rental shuttles and their associated trips on terminal roadways. The rental car companies have an incentive to avoid the operational costs and complexity associated with running redundant shuttle operations when the APM is available. Additionally, each rental car company that operates in the CONRAC would need to execute agreements with LAWA concerning their operations and passenger access to the CTA.

Response P.4-20

The comment states an opinion that implementation of the Proposed Action would encourage Airport users to use other local airports instead of LAX. The project is unlikely to change passenger demand at LAX at all; any changes are unlikely to be substantial. Please see Appendix E of the EA for a discussion of passenger forecasts

and why the proposed LAX Landside Access Modernization Program would not affect passenger demand. Please see Response to Comment P.4-11 for a discussion on the need for the Proposed Action.

Response P.4-21

Please see Response to Comment P.5-13 for the assumptions underlying the percentage of passengers expected to use the various LAX access points (ITF East, ITF West, CONRAC, and CTA) under the Proposed Action Alternative. Please see Response to Comment P.4-11 for a discussion on the need for the Proposed Action. Also, as noted in Response to Comment P.4-7, passengers would have the opportunity to either utilize the APM to access the CTA from the CONRAC, ITF East or ITF West, or they can be picked-up or dropped-off at the curb in front of their terminal. While the traffic modeling made reasonable assumptions on where different modes would operate in the future without substantial changes to CTA access, LAWA has not made any policy decisions restricting access to the CTA. Assumptions concerning mode splits for future conditions are contained in Appendix K, and were based on where LAWA predicted those modes would operate in the future. LAWA would evaluate whether additional policy changes are needed in the future to further manage congestion. LAWA would evaluate the impact on all passengers before enacting policy decisions, and utilize several methods to encourage passengers and employees to utilize the APM to access the CTA. The proposed LAX Landside Access Modernization Program provides LAWA the facilities and tools it needs to effectively manage traffic in the future.

Response P.4-22

Please see Response to Comment P.4-11 for a discussion on the need for the Proposed Action. Also, please see Response to Comment P.4-10 for a discussion of Metro's evaluation of alternatives to provide transit to LAX and Response to Comment P.4-6 for a discussion of the location of the ITF East APM Station in relation to the Metro AMC 96th Street Transit Station.

Response P.4-23

Please see Responses to Comments P.4-6 for a discussion of the location of the ITF East APM Station in relation to the Metro AMC 96th Street Transit Station, P.4-7 for a discussion of the purposes of the proposed LAX Landside Access Modernization Program, walk distances, and attractiveness of the proposed facilities to passengers and employees, P.4-10 for a discussion of Metro's evaluation of alternatives to provide transit to LAX, P.4-11 for a discussion on walk distances, and P.4-17 for a discussion on the ITFs.

Response P.4-24

Please see Responses to Comments P.4-7 for a discussion of the purposes of the proposed LAX Landside Access Modernization Program, walk distances, and attractiveness of the proposed facilities to passengers and employees, P.4-11 for a discussion on the need for the Proposed Action, and P.4-21 for a discussion on assumptions on where different modes of transportation would operate under the Proposed Action.

Response P.4-25

Please see Response to Comment P.4-11 for a discussion on the need for the Proposed Action. The commenter appears to be suggesting that one shuttle line should serve all of the off-Airport users and that somehow this would eliminate much of the current shuttle traffic and would provide a better passenger level-of-service. However, given the numerous scattered hotels and off-Airport parking locations, not to mention all of the other charter and shuttle buses to the Airport, this is infeasible. It would add an inordinate amount of time to passengers choosing to use such a shuttle, as the shuttle buses would have to make numerous stops along the

way. As noted in Response to Comment P.4-13, some of the off-Airport shuttles are already being consolidated. As noted in Response to Comment P.4-7, passengers would be provided options on how to access the Airport; they could choose to utilize the CONRAC, Metro, or ITFs and transfer to the APM, or they could choose to drive into the CTA via private vehicle, taxi, TNC, shuttle or other vehicles still operating in the CTA. As shown in Table 5-27 of the EA, traffic conditions in the CTA would considerably worsen under the No Action Alternative when compared to the Proposed Action Alternative. This would result in numerous delays and longer travel times for passengers to reach their terminal.

Response P.4-26

Please see Responses to Comments P.4-7 for a discussion of the purposes of the proposed LAX Landside Access Modernization Program, walk distances, and attractiveness of the proposed facilities to passengers and employees, P.4-11 for a discussion on the need for the Proposed Action, and P.4-15 for a discussion on the evaluation of APM alignment alternatives. Construction of an APM alignment over World Way would have substantial impacts on the operation of LAX. The structural integrity of the existing Upper World Way could not support the weight and load-bearing requirements of the APM. Reconstruction of this roadway to withstand the additional load of an APM would be extremely costly and severely impact access to the passenger terminals during construction. Construction of an elevated APM alignment along Lower World Way would require a construction right-of-way of up to 60 feet, or the equivalent of four lanes of roadway and a sidewalk. After construction, this APM alignment would result in the permanent removal of up to two roadway lanes for the placement of APM support columns. Removal of these lanes would severely impact vehicular access to the passenger terminals within the CTA. Therefore, due to the severe impact to Airport operations, this alignment option was considered infeasible.

Response P.4-27

Please see Responses to Comments P.4-5 for a discussion of the feasibility of the APM alignment along W. 98th Street versus W. 96th Street and P.4-6 for a discussion on the location of the ITF East APM Station in relation to the Metro AMC 96th Street Transit Station. Construction of an APM alignment along W. 98th Street was determined to be infeasible. As noted in Table A-6 in Appendix A of the EA, the Proposed Action would eliminate 34 parking spaces along W. 96th Street. However, the ITF West would provide approximately 8,000 public parking spaces, just west of Airport Boulevard.

As noted in Response to Comment P.4-5, sufficient space is not available along W. 98th Street to construct the APM columns, support traffic lanes and a parking/loading lane essential to the businesses and hotels located along that stretch of W. 98th Street. LAWA conducted a survey of the businesses and hotels along W. 98th Street to determine how restricting access and/or loading would affect their current operations. Most of the businesses and hotels in this area do not have loading docks and rely on W. 98th Street to conduct essential loading and unloading of materials and supplies necessary for them to operate. There are no other options for these businesses.

Please see Response to Comment P.4-10 for a discussion of Metro's independent alternatives analysis for the proposed AMC 96th Street Transit Station.

Response P.4-28

Please see Responses to Comments P.4-11 for a discussion on the need for the Proposed Action, P.4-15 for a discussion on the evaluation of APM alignment alternatives, and P.4-26 for a discussion on the feasibility of an APM alignment over World Way.

Response P.4-29

The redevelopment of Terminals 2 and 3 is not part of the Proposed Action. Please refer to the Final Environmental Impact Report for that project. As noted in Response to Comment P.4-11, the need for the Proposed Action is to provide access options into the CTA. Currently, World Way is the only point of entry into the CTA; construction of an APM would necessitate closure of at least 2 lanes of World Way on both the arrivals and departures level for 3 to 5 years, longer if phased as the commenter suggests. This would have a substantial impact on the ability of passengers to get to and from the terminals and would significantly increase travel time for passengers and employees. As noted in Responses to Comments P.4-15 and P.4-26, construction of an APM over World Way is infeasible.

Response P.4-30

Please see Response to Comment P.4-11 on the need for the Proposed Action and comparison of travel times.

Response P.4-31

The traffic model utilized to assess traffic impacts included increases in passengers and employees at the Airport based on forecasts of aviation activity for LAX (see Section K.8.1 in Appendix K of the EA). As noted in Section L.2.5.1 in Appendix L of the EA, the future traffic volume forecasts were developed using models and the land use and socioeconomic data from SCAG's 2012 Regional Transportation Plan model data set; however, the data set was also updated to include planned roadway improvements, as outlined in Section L.5. of the EA. Please also see Responses to Comments P.4-7 for a discussion of the purposes of the proposed LAX Landside Access Modernization Program, walk distances, and attractiveness of the proposed facilities to passengers and employees, P.4-8 for a discussion on private vehicles, traffic congestion, and the commercial vehicle permit program at LAX, P.4-17 for a discussion on the ITFs, and P.4-21 for a discussion on assumptions on where different modes of transportation would operate under the Proposed Action.

Response P.4-32

Please see Responses to Comments P.4-15 for a discussion on the evaluation of APM alignment alternatives and P.4-26 for a discussion on the feasibility of an APM alignment over World Way.

Response P.4-33

Amendments to the Mobility Plan 2035 to accommodate the changes proposed by the LAX Landside Access Modernization Program have been adopted and approved by the Los Angeles City Council. The language in Section 5.6.3.2.2 in Section 5, Environmental Consequences, has been updated to reflect these actions.

Response P.4-34

Please see Response to Comment P.4-7 for a discussion on what the commenter is referring to as Terminal 2.5 and Terminal 3.5. Terminals 2.5 and 3.5 are part of the Terminals 2 and 3 Modernization Project. The Terminals 2 and 3 Modernization Project is included in Table 5-35 of the EA (listed as project #21).

Response P.4-35

The commenter states that improved airside access should be part of any LAX modernization project, but recognizes that it is not part of the proposed LAX Landside Access Modernization Program. LAWA is continually planning and implementing projects at LAX, as evidenced in Table 5-35 of the EA. Please see Responses to Comments P.4-11 for a discussion on the need for the Proposed Action and P.4-15 for a discussion on the evaluation of APM alignment alternatives.

Response P.4-36

This comment is a summary of the main points raised in the comment letter. Please see Responses to Comments P.4-1 through P.4-35.

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September 25, 2017

VIA E-MAIL (EQuintanilla@lawa.org, AESPIRITU@lawa.org) AND EXPRESS U.S. MAIL AND ONLINE SUBMISSION

Los Angeles World Airports
Land Use and Entitlement Section
Attention: Evelyn Quintanilla
Chief of Airport Planning I
P.O. Box 92216
Los Angeles, California 90009-2216

Los Angeles World Airports
Attention: Evelyn Quintanilla
1 World Way, Room 218
Los Angeles, CA 90045

Re: Draft Environmental Assessment for Los Angeles International Airport Landside Access Modernization Program

Dear Ms. Quintanilla:

We represent TPS Parking Management, LLC, d.b.a. The Parking Spot ("TPS"), the owner and operator of extensive remote parking and transportation services and a major aggregator of travelers to Los Angeles International Airport ("LAX"). TPS understands the need for and supports the concept of Los Angeles World Airports' ("LAWA") Landside Access Modernization Plan ("LAMP" or the "Project"), and applauds LAWA's efforts to improve the efficiency of access to the Central Terminal Area (the "CTA"). P.5-1

However, the Draft Environmental Assessment ("EA") for the Project fails in several key areas to evaluate and disclose several key significant environmental impacts that, if properly analyzed, would make it clear that the Project requires a full Environmental Impact Study ("EIS"), and not merely an EA and a Finding of No Significant Impact ("FONSI"). P.5-2

The EA analyzes the Project on a piecemeal basis, while virtually ignoring the parallel California CEQA analysis that resulted in an EIR which, unlike the EA, concluded that the Project entailed **significant impacts requiring mitigation** on a number of fronts. The NEPA EA analysis, on the other hand, seeks to limit its scope to a narrow policy discussion, while ignoring the Project's larger context, and significant environmental and physical impacts. P.5-3

This is unacceptable and contrary to law. It is evident that the incomplete and flawed EA misleads the public into believing that the environmental impacts are much less significant than they actually are. Indeed, because the NEPA analysis comes months after the CEQA EIR certification, the public will understand this new environmental analysis to represent a revision to the original conclusions of the EIR, potentially concluding that there are no significant impacts from the LAMP Project at all. Especially because LAWA is the same entity in charge of preparation of both the EIR and the EA (jointly with the FAA). This type of confusion is precisely why the Code of Federal Regulations ("CFR") mandates the cooperation of federal and state entities tasked with analyzing the environmental impacts of any project, and the preparation of joint documents.

As stated in TPS' prior comment letters during the CEQA process, and as detailed in the pending litigation that TPS has filed challenging the adequacy of the EIR for the LAMP Project (both attached hereto and incorporated herein), the EIR is already lacking and flawed in many ways, and must be rectified in order to come into compliance with California CEQA requirements. The failure of the EA even to acknowledge the significant environmental effects in the EIR (notwithstanding its flaws) only exacerbates the misleading and inadequate documentation prepared to date. LAWA must also fully analyze the LAMP Project's impacts in an EIS, and should use this as an opportunity to concurrently correct its legally inadequate EIR through a joint EIR/EIS, as required by the CFR.

P.5-3

1. LAWA Was Required to Coordinate the NEPA and CEQA Process, and Failure to Do So Highlights the Insufficiency and Piecemeal Nature of the NEPA Analysis

The NEPA regulations contained in the CFR mandate cooperation between state and local agencies in an effort to reduce duplication in the NEPA process. Strong language in the CFR requires that agencies "**shall cooperate...to the fullest extent possible.**" (40 CFR § 1506.2(b) [emphasis added].) Federal agencies are directed to cooperate in fulfilling the requirements of state and local laws and ordinances where those requirements are in addition to, but not in conflict with, federal requirements, by preparing one document that complies with all applicable laws (40 CFR § 1506.2(c)). 40 CFR § 1506.2 provides, in relevant part:

> (b) **Agencies shall cooperate with State and local agencies to the fullest extent possible to reduce duplication between NEPA and State and local requirements, unless the agencies are specifically barred from doing so by some other law.** Except for cases covered by paragraph (a) of this section, such cooperation shall to the fullest extent possible include:

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(1) Joint planning processes.

(2) Joint environmental research and studies.

(3) Joint public hearings (except where otherwise provided by statute).

(4) Joint environmental assessments.

(c) **Agencies shall cooperate with State and local agencies to the fullest extent possible to reduce duplication between NEPA and comparable State and local requirements, unless the agencies are specifically barred from doing so by some other law.** Except for cases covered by paragraph (a) of this section, **such cooperation shall to the fullest extent possible include joint environmental impact statements.** In such cases one or more Federal agencies and one or more State or local agencies shall be joint lead agencies. **Where State laws or local ordinances have environmental impact statement requirements in addition to but not in conflict with those in NEPA, Federal agencies shall cooperate in fulfilling these requirements** as well as those of Federal laws so that one document will comply with all applicable laws.

(d) To better integrate environmental impact statements into State or local planning processes, **statements shall discuss any inconsistency of a proposed action with any approved State or local plan and laws** (whether or not federally sanctioned). **Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law.** [emphasis added]

P.5-3

There can be no doubt that LAWA has skirted the required process pursuant to 40 CFR § 1506.2, by not coordinating the process of the EIR with an EIS, in virtually every respect. The repeated use of the word "shall" emphasizes the mandatory nature of the cooperation and coordination. It is unclear what the rationale was for the utter lack of coordination, as the EA does not even have a section discussing the EIR. Where is the explanation in the EA for why the environmental analysis was not done jointly as required by the code? Where is the discussion of the inconsistency between the EA's finding of no significant impacts and the EIR's finding of significant impacts that

require mitigation? Where is the discussion of the EIR's analysis when presenting the context of the Project, and when arriving at the conclusions in the EA?

By failing to address these issues, the EA unlawfully piecemeals the Project's environmental analysis, to avoid the more stringent and nuanced analysis that is required. (40 CFR § 1508.27(b)(7) ["Significance cannot be avoided by...breaking [an action] down into small component parts].) Typically, joint environmental impact statements are prepared so that the public will be able to see the varying state and federally triggered environmental impacts and mitigation measures, and a discussion of how the Project will handle each. The joint document would normally explain why one agency has identified a significant impact, while another has not. This explanation would describe the different definitions of significance and different standards for determining significance. The public has been deprived of this analysis through the improper segmenting of the environmental analysis.

Furthermore, like NEPA, CEQA encourages cooperation with Federal agencies to reduce duplication in the CEQA process. In fact, CEQA recommends that lead agencies rely on a Federal EIS "whenever possible," so long as the EIS satisfies the requirements of CEQA. (California Public Resources Code § 21083.7.)

In cases where agency experience and judgment indicate the potential for significant impacts, the agency may choose to prepare an EIS without first preparing an EA. Indeed, if a project will clearly have one or more significant impacts, agencies often immediately proceed to preparing an EIS/EIR without first preparing an EA in the NEPA context (40 CFR § 1501.3(a) ["An assessment is not necessary if the agency has decided to prepare an environmental impact statement"]), or without the Initial Study in the CEQA context (14 CCR § 15063(a)). The reality of this case is that an EIS should have been prepared jointly with the EIR, because it is clear that there are significant effects on the environment, as such effects already have been acknowledged. By electing to prepare an EA after the fact, and not timely coordinating an EIS with the state CEQA process, LAWA has inevitably delayed its own LAMP Project. What makes this even worse is the fact that LAWA was and is intimately involved in both the preparation of the EIR and the EA (*See, e.g.*, EA Cover Page, stating that the EA was prepared for both LAWA and the FAA), and that these two documents arrive at opposite conclusions with no attempt to reconcile or explain them.

P.5-3

By pursuing the segmented NEPA process months after the CEQA analysis was complete, LAWA has violated both the federal and state regulations relating to the required environmental analysis. As such, the Project requires an EIS, which should be jointly coordinated with the CEQA process, and should also rectify the myriad legal shortcomings of the EIR through a joint EIS/EIR.

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2. Even If Analyzed Independently, There Are Major Federal Actions Significantly Affecting the Quality of the Human Environment, Which Triggers the Requirement for an EIS

An EA is prepared to determine whether the project would cause any significant effects. 40 CFR § 1508.9 provides, in relevant part:

> Environmental Assessment:
>
> (a) Means a concise public document for which a Federal agency is responsible that serves to:
>
> (1) **Briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement** or a finding of no significant impact.
>
> (2) Aid an agency's compliance with the Act when no environmental impact statement is necessary.
>
> (3) **Facilitate preparation of a statement when one is necessary**.

As discussed throughout this section, it is inconceivable that, within the context of a certified EIR and Statement of Overriding Considerations for the Project, the FAA should determine that an EIS is not necessary, and instead, prepare a FONSI. Rather, the purpose of the EA in this case would go toward facilitating the preparation of an EIS (pursuant to 40 CFR § 1508.9(a)(3)), as it is evidently necessary here.

P.5-4

An EIS is required for "major Federal actions" that "could significantly affect the quality of the human environment" (40 CFR § 1502.4; § 1508.18). The size, gravity, and scope of the LAMP Project is one which the City of Los Angeles has seldom seen, and there can be no doubt that it will significantly affect the quality of the human environment. Any argument to the contrary is belied by the EIR for this very Project, finding significant Project-related impacts and the need for mitigation in multiple categories.

The NEPA regulations define significance in terms of context and intensity. Context refers to the need to consider impacts within the setting in which they occur (40 CFR § 1508.27(a)). Intensity refers to the severity of the impact, with 10 non-exclusive criteria to consider specified in the regulations (40 CFR § 1508.27(b)). If an agency determines that an action will have one or more significant impacts on the environment, it must prepare an EIS (42 USC § 4332(c)). 40 CFR § 1508.27 provides, in relevant part:

(a) **Context**. This means that the significance of an action must be analyzed in several **contexts** such as **society** as a whole (human, national), the affected **region**, the **affected interests**, and the **locality**. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both **short- and long-term effects** are relevant.

(b) **Intensity**. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:

(1) **Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.** P.5-4

...

(3) **Unique characteristics of the geographic area such as proximity to historic or cultural resources**, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

...

(7) **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.**

(8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or **historical resources**. [emphasis added]

Each of these elements, any one of which would be sufficient to trigger an EIS on its own, are analyzed in turn below. P.5-4

(a) Context: the EIR for this Very Project Acknowledged Multiple Significant Environmental Impacts

Contextually, it is difficult to imagine a project with more significance than the LAMP Project – by virtually any measure. The traffic impacts are substantial. The construction impacts are momentous, and unlike anything the region has ever seen. The impacts are geographically far-reaching in that LAX is the key international airport serving all of Southern California. The Project will have a multitude of both short-term and long-term effects, and these effects cover the entire spectrum of environmental issue areas. The number of affected interests are practically infinite.

Most important, however, is the context that the EA almost entirely ignores: the fact that there was an EIR certified for this very Project that identified a multitude of significant impacts that had to be addressed through appropriate mitigation. Notably, even after the implementation of the proposed mitigation, the EIR identifies at least 8 (eight) different areas of significant and unavoidable impacts. (FEIR pp. 1-19 to 1-20.) The fact that the EA looks at many of these exact same areas and arrives at a different conclusion – without any explanation as to how or why – is baffling.

When an EA and FONSI are prepared, the lead agency must determine there are no significant impacts or that any significant impacts can be mitigated so that they are no longer significant. This finding simply is not possible in the context of this Project, given the polar opposite finding in the EIR. P.5-5

Under NEPA, "all relevant, reasonable mitigation measures that could improve the project are to be identified," even those outside the agency's jurisdiction. An agency is not limited to considering mitigation only for significant impacts, but should identify feasible measures for any adverse environmental impacts, even those that are not considered significant (40 CFR § 1502.16(h)). Importantly, while CEQA mitigation requirements apply only to adverse environmental impacts found to be significant, NEPA's regulations apply to any adverse impacts, even if not significant. Thus, it is hard to understand how the NEPA EA analysis would actually go into less detail in terms of mitigation than the CEQA EIR analysis – let alone without reference to the EIR or any explanation or discussion in the EA regarding how or why those different conclusions were reached.

Such an omission necessarily produced a wholly inadequate NEPA analysis. An EIS must be prepared to thoroughly analyze and discuss these outstanding contextual issues.

(b) The LAMP Project Entails Significant Impacts, Regardless that Some of Them May Be Beneficial in Nature

NEPA requires a discussion of both direct and indirect impacts of the proposed project (40 CFR § 1502.16(a)-(b)). The regulations define "effects" as "direct effects, which are caused by the action and occur at the same time and place" (40 CFR § 1508.8(a)). Indirect effects consider effects "later in time or farther removed in distance, but are still reasonably foreseeable" (40 CFR § 1508.8(b)). "Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems" (40 CFR § 1508.8). Effects include "ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative." Effects may be **both beneficial and detrimental** (40 CFR § 1508.8). Indeed, a "**significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.**" (40 CFR § 1508.27.)

The entire purpose of the LAMP Project is to improve the traffic and travel experience for travelers, and to reduce congestion of roadways in and around LAX. In concluding that there are no significant effects, the EA ignored the fact that under federal law, significant effects need not be adverse, but can be beneficial, as well. In either case, an agency must disclose those effects. Although the solutions proposed to improve the travel experience are inadequate and insufficiently disclosed (discussed in more detail in Section 3), we would not be here today if the LAMP Project did not purport to provide a significant beneficial effect on the LAX environment in the form of traffic and congestion management measures.

Because the proposed action may significantly impact the environment, the agency must prepare a Notice of Intent to begin the EIS process, or it must otherwise decide not to proceed with the proposed action.

P.5-6

(c) Cumulative Impacts

NEPA defines a cumulative impact as an "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions" (40 CFR § 1508.7). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

The failure to fully and properly analyze the cumulative impacts of the LAMP Project was one of the key issues addressed in our comments to the EIR, and in the pending

P.5-7

complaint (discussed in Section 3 below). As summarized in the attachments, the EIR does not properly analyze the cumulative impacts of this Project, and the EA fails to clear even the low bar established by the EIR. Indeed, NEPA emphasizes that "**[s]ignificance cannot be avoided by ...breaking it down into small component parts.**" (40 CFR § 1508.27(b)(7) [emphasis added].) As discussed in Section 1 above, this is exactly what the EA has done, by failing to coordinate with CEQA, and failing to even acknowledge, discuss, and contrast the significant impacts disclosed, in however flawed a manner, in LAWA's EIR. P.5-7

(d) Unique Characteristics and Historic Resources

Historic and Architectural resources are the only areas in the EA where a significant adverse impact is expressly acknowledged. However, the EA claims that with "implementation of mitigation measures, significant impacts to the Theme Building as a result of the construction of the APM guideway and pedestrian walkway, would be reduced to less than significant." (EA p. 5-65.) There are other unique characteristics of this Project, however, that the EA does not acknowledge, such as the size of the Project, the scope of the Project, the far-reaching effects of the Project, and other issues addressed above. An EIS is therefore necessary to analyze those effects, pursuant to 40 CFR § 1508.27(b)(3) and (b)(8). P.5-8

3. Substantively, the EA is Lacking in Many Areas, and the Project Requires a Full Analysis as Part of an EIS

As mentioned above, TPS has previously submitted comment letters during the EIR evaluation process (see Exhibit 1), and has subsequently filed a writ of mandate in Los Angeles Superior Court addressing the legal deficiencies of the EIR (see Exhibit 2). Those comments and arguments are incorporated in full herein by reference, as they apply with equal or greater force to the shortcomings of the EA. The list below will serve to summarize the substantive inadequacies, addressed in greater detail in the comment letter (Exhibit 1) and petition for writ of mandate (Exhibit 2): P.5-9

- Fails to Provide an Adequate Project Description With Respect to "Future Related Development" P.5-10
- Fails to Fully Describe and Evaluate Growth Inducing Impacts Caused by the LAMP Project P.5-11
- Fails to Fully Describe and Evaluate Cumulative Impacts Caused by the LAMP Project P.5-12

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- Fails to Provide an Adequate Project Description With Respect to Traffic Plans for Shuttles, Taxis, and Rideshare Applications — P.5-13
- Fails to Evaluate the Potentially Affected Unsignalized Intersections — P.5-14
- The Stated Purpose and Objective of the Project is Contradicted and Obviated by its Significant Traffic Impacts — P.5-15
- The Proposed Mitigation Measures Lack Performance Standards and Enforceability — P.5-16
- Ignores Significant Air Quality Impacts — P.5-17
- Fails to Evaluate and Disclose Construction-Related Impacts — P.5-18

Of particular note is the fact that the EA provides a list of objectives, most of which focus on traffic efficiency improvements, particularly in relation to access to and operations within the CTA, as well as other parking facilities and rental cars, and congestion relief. (EA pp. ES-2-ES-3.) However, the proposed operations of trip aggregators, such as shuttles, run contrary to these goals. The Project perpetuates and prioritizes low-ridership vehicle access to the CTA, while counter-intuitively limiting higher efficiency and higher ridership aggregators like shuttles, and relegates those to the ITFs. (*See, e.g.*, EA p. 3-23 ["ITF West would also provide curb areas for private vehicles, parking shuttles, hotel shuttles, charter vans, and public transit buses."].)

Although the Project description is extremely vague as to which shuttles will be going where, the EA appears to state the Project would result in the discontinuation of shuttle access to the CTA, relegating them to the ITFs. (*See id.*) The EIR erroneously used limited (and flawed) assumptions in its traffic studies, and concluded that it will reduce traffic flow by 48%, but then illegally deferred discussion of how LAWA would achieve this goal, preventing any meaningful evaluation by the public or decision makers. The EA is even more vague and ambiguous than the EIR was as to how the purported goals and objectives of the LAMP Project are to be achieved. Which cars will go where? How are the ITF's supposed to be designed to accommodate the appropriate vehicles if we don't even know which types of vehicles (buses, shuttles, limos, taxis, private vehicles, transportation network companies, etc.) will be dropping off at which locations, and the projected flows of each? And, perhaps more importantly, are the assumptions of the EA consistent with those of the EIR? — P.5-19

The crux of the LAMP Project is being left for decisions to be made at a later time. That is unacceptable. If the Project is meant to design a solution to the traffic problems at

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LAX, the analysis upon which those solutions are based must be thorough, must be specific, and must be robust. The EA fails on all fronts. P.5-19

An EIS must be prepared here, and the EIS must thoroughly analyze and present concrete proposals for which types of vehicles will be delegated to which locations (ITF West, ITF East, or CTA). Without this, the public is being deprived of a real Project analysis. The EA offers nothing more than a good theory that is completely lacking in any tangible evidence to back up its goals. P.5-20

We therefore urge LAWA and the FAA to conduct a proper NEPA analysis as the law requires. The EIS should be prepared jointly with a revised EIR to rectify the problems that TPS has identified herein, and in Exhibits 1 and 2, and to bring it into compliance with the relevant provisions of NEPA discussed above. P.5-21

Sincerely,

BENJAMIN M. REZNIK of
Jeffer Mangels Butler & Mitchell LLP

Responses to Comment Letter P.5

Response P.5-1

The comment is noted.

Response P.5-2

The Draft EA was completed in compliance with the requirements of Section 102(2)(c) of the National Environmental Policy Act of 1969 (NEPA, 42 United States Code [U.S.C.] 4321-4370), the President's Council on Environmental Quality (CEQ) Regulations 40 Code of Federal Regulations (CFR) §§ 1500-1508 and in accordance with FAA Order 1050.1F, Environmental Impacts: Policies and Procedures, and FAA Order 5050.4B, National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions. An Environmental Impact

Statement (EIS) is required for actions significantly affecting the human environment. Specifically, FAA Order 1050.1F states, "An EIS is required when any of the impacts of the proposed action, after incorporating any mitigation commitments, remain significant to the human environment."[4]

The Draft EA evaluated the potential effects of the Proposed Action in accordance with FAA guidance and applicable law. FAA has evaluated comments received on the Draft EA, incorporated any changes into the Final EA deemed necessary based on those comments, and will make an environmental determination in the near future.

Response P.5-3

The crux of this comment is that a joint CEQA/NEPA analysis was required for environmental review and disclosure related to the LAX Landside Access Modernization Program, and that a failure to prepare a joint CEQA/NEPA document has resulted in a variety of issues, both practical and legal in nature. The alleged problems flowing from preparation of separate CEQA and NEPA documents as identified in the comment include: (1) the commenter believes there is a legal requirement to prepare a joint CEQA/NEPA document for the LAX Landside Access Modernization Program project, (2) in the commenter's view, a reversal of conclusions regarding significance of impacts between the time the Environmental Impact Report (EIR) was prepared and the time the EA was prepared, and (3) from the commenter's perspective, a "piecemeal" approach to environmental analyses. Please see Response to Comment P.5-2 regarding the development of the Draft EA in compliance with applicable federal regulations. Contrary to the assertion in comment P.5-3 that a joint NEPA/CEQA document was legally required for the LAX Landside Access Modernization Program project, Section 1506.2 of the Council on Environmental Quality (CEQ) Regulations implementing NEPA encourages cooperation between state and local agencies in preparing environmental documents. However, the regulation does not require preparation of joint documents, nor does it prohibit preparation of separate CEQA and NEPA documents. Section 1506.2 primarily concerns the elimination of duplication with state and local procedures. Many states have statewide environmental regulations that are similar to NEPA and evaluate the potential effects of projects in the same manner as NEPA. Specifically, they require a comparison of the Proposed Action and any reasonable alternatives to a no action alternative in the same timeframe. This approach differs from CEQA, which requires a comparison of a proposed project to an environmental baseline.

LAWA and FAA have prepared joint NEPA/CEQA documents in the past, but in this instance determined that preparing separate CEQA and NEPA documents would be the best approach. FAA has found that joint CEQA/NEPA documents can in some cases create more total volume of material, take more time, and create serious confusion for the public, cooperating agencies, and other stakeholders. Because there are differences in analyses, and the significance thresholds applicable to CEQA are distinct from those under NEPA, FAA has found that contrary to the commenter's claims, it sometimes confuses the public to discuss CEQA and NEPA impacts in the same document. As a result, while FAA and LAWA closely coordinated planning, studies (especially critical traffic and air quality studies), and outreach to cooperating agencies, FAA determined that separating the NEPA and CEQA documents for this project would better serve the other objectives of NEPA, including clear communication to the public, effective coordination with cooperating agencies, minimization of paperwork, and reasonable timeframes. FAA and LAWA determined that a sequenced CEQA, then NEPA process with continuous coordination between FAA and LAWA, would be the best means of maximizing effective

[4] U.S. Department of Transportation, Federal Aviation Administration, Order 1050.1F, *Environmental Impacts: Policies and Procedures*, effective July 16, 2015.

coordination between the state and federal requirements. This included regular meetings between LAWA and FAA throughout both environmental processes to discuss environmental issues, potential environmental effects, proposed mitigation, agency concerns and coordination, and public concerns.

Additionally, LAWA and the FAA have cooperated fully with state and local agencies, as evidenced by the fact LAWA, as the local agency responsible for CEQA compliance, prepared the EA, the California State Department of Transportation (Caltrans) is a cooperating agency on the EA, and that the air quality protocol (contained in Appendix F of the EA) was coordinated with the U.S. Environmental Protection Agency, California Air Resources Board, South Coast Air Quality Management District, Caltrans, and the Southern California Association of Governments. Additionally, FAA conducted extensive coordination with the State Historic Preservation Officer, attended public meetings during the CEQA process, and conducted public scoping, as well as a public workshop on the Draft EA.

Regarding the comment that LAWA and the FAA reversed significant impact conclusions between the time of the EIR's preparation and the EA's preparation, this is a flawed conclusion. One reason LAWA and the FAA selected to prepare separate CEQA and NEPA documents is the confusion that can result when a single joint document reaches different conclusions regarding significance of impacts within a particular resource category due to the different thresholds for significance under the two statutes. A significant impact conclusion under CEQA standards does not equate to a significant impact conclusion under NEPA in many cases. This is not evidence of a faulty or misleading analysis; it is a function of the unique statutory regimes established under these two different statutes. Rather than reversing conclusions regarding significance after the EIR was completed, each document properly analyzed impacts under significance criteria applicable to the statute at issue, and reached reasonable conclusions under the review procedures established for the statute in question.

Last, the Draft EA did not segment or piecemeal the Proposed Action or the analysis of its impacts, as suggested by the commenter. In fact, the Draft EA evaluated the potential effects of the entire proposed LAX Landside Access Modernization Program including connected actions, as described in Section 1.2 in Section 1, Introduction and Background, and Appendix A of the EA. LAWA completed an EIR for the proposed LAX Landside Access Modernization Program in compliance with CEQA; the Draft EA evaluated the same project elements and connected actions as identified and evaluated in the EIR. Thus, there was no segmentation of the LAX Landside Access Modernization Program project, because the project scope and description were the same between the CEQA and NEPA processes. The commenter has not identified any specific project elements that it claims were segmented from the LAX Landside Access Modernization Program project. As noted in the Draft EA, mitigation measures identified in the EIR for the proposed LAX Landside Access Modernization Program were incorporated as project design features or mitigation measures in the Draft EA. The NEPA analysis acknowledged and adopted elements of the CEQA alternatives analysis and used the same underlying studies of critical environmental attributes, including traffic. As a ground access project, the LAX Landside Access Modernization Program NEPA analysis focuses heavily on ground transportation impacts and used the same traffic study as the EIR, including the same inputs, assumptions, and methodologies. Please see Response to Comment P.5-7 for additional discussion of why there is no credible claim of improper project segmentation.

Although the commenter asserts that the public would misunderstand the Draft EA as a revision to the EIR, LAWA's February 2015 Notice of Preparation/Initial Study of the LAX Landside Access Modernization Program EIR explained that "Prior to construction of the LAX Landside Access Modernization Program, the specific details of the proposed Project will be evaluated by the FAA in compliance with NEPA and other federal requirements,

and LAWA must obtain the appropriate approvals from the FAA, including an amended ALP." Similarly, the LAX Landside Access Modernization Program Draft EIR issued September 2016 stated clearly that the FAA initiated environmental review of the project on June 22, 2016 in compliance with NEPA and other federal requirements. (Draft EIR, pp. 1-3, 2-3.)

As noted in Response to Comment P.5-2, FAA Order 1050.1F states, "An EIS is required when any of the impacts of the proposed action, after incorporating any mitigation commitments, remain significant to the human environment." FAA has evaluated the comments received on the Draft EA, incorporated any changes into the Final EA, and will make an environmental determination in the near future.

LAWA has responded to the commenter's previous comments, included as an exhibit to their comment letter on the Draft EA, during the CEQA process. Because they are focused on CEQA-specific issues, they are not relevant to the information or analyses contained in the Draft EA.

Response P.5-4

As noted in Response to Comment P.5-2, the Draft EA was completed in compliance with the requirements of Section 102(2)(c) of the National Environmental Policy Act of 1969 (NEPA, 42 United States Code [U.S.C.] 4321-4370), the President's Council on Environmental Quality (CEQ) Regulations 40 Code of Federal Regulations (CFR) §§ 1500-1508 and in accordance with FAA Order 1050.1F, *Environmental Impacts: Policies and Procedures* and FAA Order 5050.4B, *National Environmental Policy Act (NEPA) Implementing Instructions for Airport Actions*. Pursuant to these laws and regulations, an Environmental Impact Statement (EIS) is required for actions significantly affecting the human environment. Specifically, FAA Order 1050.1F states, "An EIS is required when any of the impacts of the proposed action, after incorporating any mitigation commitments, remain significant to the human environment."

At its essence, the purpose of the proposed LAX Landside Access Modernization Program is to shift traffic out of the CTA and off of surrounding roads to remote facilities located closer to main routes of travel, providing passengers and employees with different options to access the CTA. The net effect of the proposed LAX Landside Access Modernization Program is to reduce traffic and vehicle miles traveled. It would not result in an increase in passengers or aircraft operations. The Proposed Action examined in the Draft EA assessed the entirety of the proposed LAX Landside Access Modernization Program, including all project components and all connected actions. All environmental resources were evaluated and effects to those resources assessed against the significance thresholds identified in FAA Order 1050.1F and the 1050.1F Desk Reference.[5] FAA has evaluated comments received on the Draft EA, incorporated any changes into the Final EA, and will make an environmental determination in the near future.

As noted in Response to Comment P.5-3, the environmental analysis of a project's proposed effects is conducted differently under CEQA and utilizes different thresholds to determine significance. Thus, it is not surprising that the results of the analysis would differ between the CEQA and NEPA processes. As noted in Response to Comment P.5-3, all mitigation measures identified in the EIR completed for the proposed LAX Landside Access Modernization Program were incorporated as project design features or as mitigation measures in the Proposed Action identified in the Draft EA. The commenter provides no information or evidence showing that impacts of

[5] U.S. Department of Transportation, Federal Aviation Administration, Office of Environment and Energy, *Order 1050.1F Desk Reference*, July 2015.

the project would reach any of the FAA NEPA thresholds of significance identified in Orders 1050.1F or 5050.4B. The comments also do not identify how project budget, size, or other attributes create sufficient scope and context to result in a significant environmental impact for NEPA purposes. The cost of the Proposed Action does not demonstrate a significant impact.

Response P.5-5

Please see Responses to Comments P.5-3 for a discussion on how NEPA analysis and thresholds differ from CEQA and P.5-4 for a discussion on the overall purpose of the Proposed Action, as well as mitigation measures. Under NEPA and CEQA, the lead agency is responsible for identifying significance thresholds for evaluating potential environmental effects of proposed projects. LAWA, as the responsible agency under CEQA, utilizes significance thresholds adopted by the City of Los Angeles and LAWA to evaluate environmental effects under CEQA. For example, in the CEQA document for the proposed LAX Landside Access Modernization Program, the LADOT Traffic Study Policies and Procedures[6] were used to determine if a significant impact was generated by the proposed project. Based on the LADOT definition, an impact is considered to be significant if one of the following thresholds is met or exceeded:

- The LOS is C, its final V/C ratio is 0.701 to 0.800, and the Project-related increase in V/C is 0.040 or greater, or
- The LOS is D, its final V/C ratio is 0.801 to 0.900, and the Project-related increase in V/C is 0.020 or greater, or
- The LOS is E or F, its final V/C ratio is 0.901 or greater, and the Project-related increase in V/C is 0.010 or greater.

By comparison, FAA has not identified a significance threshold for surface traffic impacts. In fact, under FAA's NEPA implementing instructions, surface traffic is analyzed as one component of a larger socioeconomic impacts analysis, which is the resource category under which surface traffic is analyzed by FAA. Although there are no specific thresholds of significance that apply, FAA has identified context and intensity factors that should be considered when undertaking socioeconomic analysis, one of which addresses surface traffic impacts. FAA Order 1050.1F, Exhibit 4-1 states that a factor to consider is whether the proposed action would disrupt local traffic patterns and substantially reduce the levels of service of roads serving an airport and its surrounding communities. Because the City's and FAA thresholds are very different, one specific and quantitative and the other not specific and primarily qualitative in nature; one focused on surface traffic as an independent resource to be analyzed in the document, and the other evaluating surface traffic as one among several considerations related to socioeconomic impacts, the analysis of the effects of a project related to surface traffic often leads to different conclusions. This is just one example of how significance is evaluated differently under CEQA and NEPA, but divergent analytical conclusions based on distinct significance thresholds are an unsurprising outcome of analysis under these two statutes.

As noted in Responses to Comments P.5-3 and P.5-4, the mitigation measures identified in the EIR have been incorporated into the Proposed Action evaluated in the Draft EA as either mitigation measures, commitments,

[6] Los Angeles Department of Transportation, *Traffic Study Policies and Procedures*, August 2014. Thresholds are the same as the thresholds in the L.A. CEQA Thresholds Guide.

or project design features (see in particular Appendix A and Section 5.9.3.2.1 of the EA for project design features related to traffic).

Response P.5-6

Please see Response to Comment P.5-2 regarding the development of the Draft EA in compliance with federal regulations. The Draft EA evaluated the direct and indirect effects of the Proposed Action. It included an evaluation of the potential induced socioeconomic impacts (see Section 5.9 of the Draft EA) and analyzed conditions based on the projected growth in passengers, population, housing, and employment in the affected area that would occur irrespective of the Proposed Action. The Draft EA identified both adverse and beneficial effects of the Proposed Action as evidenced by the air quality and traffic analyses provided in Section 5, Sections 5.1 and 5.9, respectively. While the commenter is correct that the proposed LAX Landside Access Modernization Program would result in beneficial effects, those beneficial effects do not cause significant impacts based on FAA's significance thresholds. Furthermore, the intent of the CEQ regulations at 40 CFR § 1508.8 is not to require an EIS for a project that produces beneficial impacts and no significant negative impacts. Rather, the regulations are designed to prevent a significant impact in one resource from being "washed out" through a high-level, overall balancing of negative and positive impacts when determining whether to prepare an EIS. The regulations require federal agencies to prepare an EIS where a significant impact persists despite an overall analysis that beneficial impacts of implementing a proposed action may be many. Based on the analysis documented in the Draft EA, no impacts of the Proposed Action, after incorporating mitigation commitments, remain significant.

Response P.5-7

Please see Responses to Comments P.5-2 regarding the development of the Draft EA in compliance with federal regulations and P.5-3 regarding segmentation or piecemealing. The Draft EA evaluated the cumulative effects of the Proposed Action, which was documented in Section 5.12 in Section 5, Environmental Consequences, of the Draft EA. Based on the analysis documented in the Draft EA, no impacts of the Proposed Action, after incorporating mitigation commitments, remain significant. The comment does not provide any specific information regarding what cumulative actions or impacts it alleges were not considered or not considered properly in the EA.

Furthermore, the comment erroneously conflates several concepts in the NEPA process. First, it is true that agencies cannot avoid finding significant impacts by improperly segmenting a single course of action into multiple separate, smaller actions when determining the scope of the proposed action to be examined in the environmental document. This concept addresses project definition and the duty of the agency to properly define the project; the regulations require federal agencies to ensure the scope of the actions subject to a single environmental review is proper (40 CFR § 1502.4(a), 40 CFR § 1508.25(a)). Here, there can be no claim that the FAA improperly segmented related actions when defining the scope of the action examined in the EA, as all project elements have been examined as a single action in a single EA. The comment instead appears to redefine this concept by arguing that the FAA has improperly broken the project down into smaller component parts by conducting a NEPA review separate from the CEQA review, and by relying on federal thresholds of significance rather than CEQA thresholds of significance in that review. This theory is simply incorrect and is unrelated to the regulation relied upon for support. Both the EIR and EA, though appropriately relying on standards applicable to these separate legal processes, defined the scope of the project identically. There can be no credible claim of project segmentation.

Second, it is also true that after properly defining the scope of the action to be examined in a NEPA document, an agency cannot ignore other separate actions in a geographic area that may have overlapping impacts that, when examined in context with the proposed action, may result in a significant cumulative impact (40 CFR § 1508.7, 40 CFR § 1508.25(c)). This concept relates not to the definition of the project (and therefore the scope of the project subject to a single environmental review), but rather addresses the need to consider synergistic impacts of other actions when examined in the context of the proposed action – including actions over which the federal agency may have no approval authority. The comment does not identify any project or action that the EA fails to examine that would have cumulative impacts when examined in context with the LAX Landside Access Modernization Program. Nor does the comment identify a single impact category or type of impact that is cumulatively significant but unexamined in the EA. Therefore, the EA reasonably concluded that there are no significant cumulative environmental impacts from the Proposed Action Alternative.

Response P.5-8

Please see Responses to Comments P.5-2 regarding the development of the Draft EA in compliance with federal regulations, P.5-3 for a discussion of the project analyzed in the Draft EA, and P.5-4 in regards to scope and complexity of the Proposed Action. The EA evaluated the potential effects of the entire Proposed Action on historic resources, which were identified by survey and documented in Appendix H of the EA. Effects on historic resources were identified and evaluated in compliance with FAA guidance and with Section 106 of the National Historic Preservation Act of 1966, as amended (54 U.S.C. 306108). As documented in the Draft EA, the State Historic Preservation Officer (SHPO) concurred with FAA's findings on the proposed undertaking. The SHPO also agreed with FAA that a Memorandum of Agreement (MOA), in which mitigation measures are set out and roles and responsibilities for the implementation of these measures is clearly stated, is the appropriate vehicle for the resolution of adverse effect. The comment does not provide any specific information regarding "unique characteristics" of the Proposed Action or how these would relate to intensity and context in a way that would create a significant impact. Contrary to the commenter's assertion, the EA does contain thorough information regarding the size, scope, and effects of the Proposed Action.

Response P.5-9

Please see Response to Comment P.5-3 regarding previous comment letters submitted. LAWA has responded to the commenter's previous comments, included as an exhibit to their comment letter on the Draft EA, during the CEQA process. Because they are focused on CEQA issues, they are not relevant to the information or analyses contained in the Draft EA.

Response P.5-10

Please see Responses to Comments P.5-3 for a discussion of the project analyzed in the Draft EA and P.5-7 for a discussion on cumulative projects. The potential future related development refers to development that could occur on land owned by LAWA adjacent to the CONRAC and ITFs after those facilities have been constructed. LAWA has no specific plans for development on that land, but instead has identified that those areas could be developed by third-party developers for commercial or light industrial uses. The potential future related development would have independent utility from the Proposed Action. There are no definitive plans for the type or size of development that would occur on these parcels. Furthermore, the potential future related development would not be implemented by LAWA. Thus, as there are no definitive plans for these parcels, and the LAX Landside Access Modernization Program is not dependent on the potential future related development,

it is not part of the Proposed Action. However, it was identified as a cumulative project and evaluated as such in the Draft EA (see item 26 in Table 5-35, Section 5, Environmental Consequences, of the EA).

Response P.5-11

Please see Response to Comment P.5-6 for a discussion on the evaluation of direct and indirect effects as well as induced socioeconomic impacts. The LAX Landside Access Modernization Program would not impact aviation facilities at LAX, but instead addresses existing ground access deficiencies that create surface traffic congestion during peak periods at LAX. Implementation of the LAX Landside Access Modernization Program would not affect or change any airfield components, including the runways, taxiways, or aircraft arrival and departure procedures, and thus would not increase the capacity of the LAX airfield or the Airport as a whole. The Proposed Action would affect only efficiency of the landside/roadway system and landside development.

The decision to choose to fly to, from, or through LAX is driven by many factors, including: socioeconomic data, demographics, disposable income, geographic attributes, and external factors such as fuel costs and airline industry-related factors (airline mergers, airline hubbing practices, and airfares).[7] Although congested traffic conditions in the CTA at LAX may cause passengers to allow more time to get to the Airport to account for traffic delays, historic data and forecasts of activity or passenger practices do not suggest that the Proposed Action would increase the number of passengers at LAX (see Appendix D of the EA). It would only change how passengers access the Airport and terminal facilities, improve access options, and improve the landside travel experience for passengers. Because the Proposed Action would not affect the airfield capacity of LAX, would not affect the passenger terminal facilities at LAX, and would not affect aircraft operations at LAX, the Proposed Action would not result in any substantive change in the number of passengers at LAX; it would only change how passengers access the Airport and terminal facilities. FAA forecasts of aviation activity for the planning period at LAX are consistent with this conclusion.

Response P.5-12

Please see Response to Comment P.5-7 for a discussion on cumulative impacts.

Response P.5-13

The traffic modeling conducted for the Draft EA made reasonable assumptions on where different modes would operate in the future. Future mode shares were estimated based on an analysis of the modes passengers have used to get to and from the Airport as identified in passenger surveys conducted at LAX in 2006, 2011, and 2015. The assignment of mode shares to the different access points (CTA, ITF West, ITF East, and CONRAC) was based on logical assumptions concerning where different modes could easily access the Airport. Specifically, it was assumed that for rental car companies operating at the CONRAC, their agreements to use the CONRAC would not allow them to operate separate shuttles into the CTA, therefore, all passengers renting or returning rental cars would access the Airport via the CONRAC APM Station. Additionally, due to the proximity of the ITF East to I-405 and Metro's planned AMC 96th Street Transit Station, charter buses and long-distance vans and buses were assumed to be staged at the ITF East. The construction of the ITF East adjacent to the I-405 freeway and several arterial roadways would provide a convenient location to consolidate traffic that currently is spread

[7] U.S. Department of Transportation, Federal Aviation Administration, Advisory Circular 150/5070-6B, Change 2, *Airport Master Plans*, January 27, 2015, Chapter 7 Aviation Forecasts, pp. 37-38, Available: http://www.faa.gov/documentLibrary/media/Advisory_Circular/150-5070-6B-Change-2-Consolidated.pdf, accessed August 25, 2016.

throughout the neighborhoods and then transport these passengers, visitors, and employees to and from the CTA using a time-certain mass transit (APM) system. In 2015, approximately 29 percent of passengers surveyed resided outside of Los Angeles County; over 50 percent of all passengers surveyed utilized the I-405 to access LAX.[8]

Similarly, due to the proximity of the ITF West to a majority of Airport hotels and off-Airport parking operators, hotel and off-Airport parking shuttles and some charter vans were assumed to be staged at the ITF West. It was assumed that allowing the charter buses, shared ride vans, hotel shuttles, off-Airport parking operators, and other commercial vehicle operators to pick-up and drop-off passengers at the ITF West or ITF East would be the preferred choice as it shortens the trips for these busing and shuttle operations, and provides a more reliable travel time for their customers, as their customers will not be dependent on traffic conditions within the CTA. The assumptions are reasonable, because use of the ITFs would make the most business sense for bus, van and shuttle operators due to the uncertainty and increased time associated with CTA trips (as much as 30 extra minutes per trip during peak periods, which reduces the number of round trips each vehicle/driver can make and the trip frequency for customers). CTA trips, by contrast, result in greater expenses for businesses for additional vehicles, drivers, driver time, operating and maintenance costs and other factors associated with tying up vehicles in CTA traffic.

If actual use were to vary from the reasonable assumptions made in the traffic modeling, LAWA will have many policy tools to ensure that the congestion relief intended for the proposed Project is achieved, including parking pricing, CTA access policies, CTA access pricing and commercial vehicle licensing. As noted in Response to Comment P.4-8, the LAWA Board of Airport Commissioners (BOAC) approved a resolution in 1987 approving a ground transportation permit program, rules and regulations governing this program, and authorization for LAWA to execute Non-Exclusive License Agreements (NELA), and issuance of vehicle permits to operators of commercial vehicles transporting passengers to and from LAX. NELAs are routinely issued to qualified operators of Charter Party Carrier Transportation and Courtesy Vehicle Transportation Services to and from LAX, which is currently served by over 3,400 authorized Charter Party and Courtesy operators. Each operator must satisfy all application requirements, which include applicable California Public Utilities Commission regulations, City Business Tax Registration, LAWA Insurance, and Department of Motor Vehicles registration. Each operator is required to abide by all LAX Rules and Regulations while operating at LAX. LAWA also has concession agreements with Commercial Ground Transportation (CGT) vehicles, which include taxis, rental car agency shuttles, hotel shuttles, off-Airport parking shuttles, and shared ride vans, who must also satisfy similar requirements.

Once the proposed LAX Landside Access Modernization Program facilities (i.e., the CONRAC, ITF East, and ITF West) are constructed, the NELAs, vehicle permits, and concession agreements would have to be amended or issued to allow commercial vehicle operators to operate at these facilities. To reduce congestion on the CTA roadways, LAWA would update the LAX ground transportation permit program to allow and/or require commercial operators to pick-up and drop-off passengers at the ITF East and ITF West.

LAWA is investing over $5 billion into the LAX Landside Access Modernization Program to provide better access options and manage traffic congestion at LAX. LAWA will utilize the facilities associated with the LAX Landside Access Modernization Program and policy measures to adaptively manage and control traffic congestion to provide a better and more consistent passenger experience than exists today. Once the LAX Landside Access

[8] Unison Consulting, Inc., *Final Report, Los Angeles International Airport 2015 Air Passenger Survey Results and Findings*, February 2016.

Modernization Program facilities are open, LAWA may restrict access to the CTA for some commercial operators or could also institute pricing differential strategies to encourage private vehicles and commercial vehicle operators to pick-up and drop-off passengers at the ITF East and the ITF West.

At this time, LAWA has not made any policy decisions regarding traffic plans for non-rental-car shuttles, taxis, or TNCs. LAWA would evaluate the impact on all passengers before enacting policy decisions, and utilize several methods to encourage passengers and employees to utilize the APM to access the CTA. LAWA would take steps in order to effectively manage traffic congestion in the CTA and around Airport facilities. The proposed LAX Landside Access Modernization Program provides LAWA the facilities and tools it needs to effectively manage congestion in the future.

Response P.5-14

The City of Los Angeles Traffic Study Policies and Procedures provides direction relative to determining the scope of analysis locations for projects. The City's directive on page 15 specifically states the following: "When determining which intersections should be included in the impact analysis for development projects, only signalized intersections should be selected. Unsignalized intersections should be evaluated solely to determine the need for installation of a traffic signal or other traffic control device, but will not be included in the impact analysis. When choosing which un-signalized intersections will be reviewed, intersections that are adjacent to the project or those that are integral to the project's site access and circulation plan should be identified." As noted in Appendix L, Off-Airport Traffic, of the EA, the methodology and base assumptions used in the traffic analysis were established in conjunction with the California Department of Transportation (Caltrans) and City of Los Angeles Department of Transportation (LADOT). The methodology and assumptions were shared with the City of Culver City, City of Inglewood, City of El Segundo, and the County of Los Angeles Department of Transportation.

When a proposed project would cause traffic to increase at an unsignalized intersection such that backups would occur, the appropriate mitigation is to make the intersection signalized, which is what LAWA proposes to do as part of the Proposed Action. Unsignalized intersections at Bellanca Avenue and 98th Street, 98th Street and New "A" Street, and 96th Street and Sepulveda Boulevard are all proposed to be signalized as part of the Proposed Action. The intersection of 98th Street at Sepulveda Boulevard is also unsignalized and would not be altered by the Proposed Action since it would not be used for site access or circulation to the proposed facilities. These intersections, once signalized, would operate at LOS D or better. LOS D is defined by the Transportation Research Board as fair traffic conditions – delays may be substantial during portions of the rush hours, but enough lower volume periods occur to permit clearing of developing lines, preventing excessive backups. Section 5.9.2 in Section 5, Environmental Consequences, of the EA, states that FAA has not established a quantitative significance threshold specific to surface transportation impacts. Rather, a factor to consider when determining the effects of an alternative is whether the alternative would "disrupt local traffic patterns and substantially reduce the levels of service of roads serving an airport and its surrounding communities."[9] Section 5.9.4.2.1 under the heading "Off-Airport Traffic" in Section 5, Environmental Consequences, of the EA states that if there is a change from LOS A, B, C, or D under the No Action Alternative to LOS E or F under the Proposed

[9] U.S. Department of Transportation, Federal Aviation Administration, Order 1050.1F, *Environmental Impacts: Policies and Procedures*, effective July 16, 2015.

Action Alternative, the impact thresholds of the local jurisdiction where the intersection is located were considered to determine if the reduction in level of service would result in a local impact.

Response P.5-15

Section 2.3 in Section 2, Purpose and Need, of the EA identifies the need for the Proposed Action, which include:

- Need for improved access options
- Need for reduction of traffic congestion
- Need for shifting traffic outside of the CTA
- Need for transit connectivity
- Need to improve connectivity and mobility

As noted in that section, the reliance on a single access point into the CTA for all ground vehicles for passengers (including transit, private vehicles, taxis, TNCs, limousines, and shuttles) currently results in more time spent in traffic, uncertain travel times, more passenger hours traveled, congestion and delay in the CTA, as well as back-ups onto the surrounding local and regional roadway network.

Section 5.9.4.2.4, in Section 5, Environmental Consequences, of the EA, documents the on-Airport and off-Airport traffic conditions under the No Action Alternative and the Proposed Action Alternative. As shown in Table 5-27, traffic conditions in the CTA would considerably worsen under the No Action Alternative when compared to the Proposed Action Alternative. Tables 5-29 through 5-31 identify the traffic conditions off-Airport under the No Action Alternative and Proposed Action Alternative. As discussed in Section 5.9.4.2.4 of the EA, the Proposed Action would not result in significant impacts to traffic, but instead would result in similar or improved traffic conditions when compared to the No Action Alternative at most of the study intersections.

Response P.5-16

The mitigation measures identified in the Draft EA relate to the adverse effect on the Theme Building. These mitigation measures are contained in a Memorandum of Agreement (MOA) between the FAA, SHPO, and LAWA; a copy of the MOA is contained in Appendix H of the EA. Under Section 106 of the National Historic Preservation Act, and as specified in the MOA, FAA, as the lead federal agency, is responsible for ensuring that the stipulations in the MOA are implemented in order to take into account the effects of the undertaking on historic properties.

All other commitments and project design features (see Appendix A and Section 5.9.3.2.5 for project design features related to traffic) identified in the EA are those that LAWA has committed to implementing as part of the Proposed Action. All of these mitigation measures contain sufficient performance standards and are enforceable at the local level. These commitments and project design features are also contained in the Mitigation Monitoring and Reporting Program that the Board of Airport Commissioners (BOAC) and the Los Angeles City Council adopted for the LAX Landside Access Modernization Program. In addition to the local mechanisms for implementing and enforcing mitigation relied upon for the CEQA approval, the FAA may also identify mandatory mitigation when it issues its decision. In the event that the FAA issues a Finding of No Significant Impact for the Proposed Action Alternative, any mitigation relied upon in reaching this finding is specifically identified in the FAA's decision document, and is made a condition of approval of the project.

Response P.5-17

Please see Response to Comment P.5-2 regarding the development of the Draft EA in compliance with federal regulations. The effects of the Proposed Action on air quality were evaluated in accordance with the air quality protocol (contained in Appendix F of the EA) reviewed by the U.S. Environmental Protection Agency, California Air Resources Board, South Coast Air Quality Management District, Caltrans, and the Southern California Association of Governments. Section 5.1, Air Quality, in Section 5, Environmental Consequences, of the Draft EA, identifies the air quality effects of the Proposed Action. Based on this extensive evaluation, the EA concluded that no significant air quality impact threshold would be exceeded.

Response P.5-18

Please see Response to Comment P.5-2 regarding the development of the Draft EA in compliance with federal regulations. Construction impacts of the Proposed Action were evaluated and discussed for every resource category in Section 5, Environmental Consequences, of the Draft EA. Please see Sections 5.1.3 (Air Quality), 5.2.3 (Climate), 5.3.3 (Department of Transportation Section 4(f) and Land and Water Conservation Fund Act, Section 6(f) Resources), 5.4.3 (Hazardous Materials, Solid Waste, and Pollution Prevention), 5.5.3 (Historic, Architectural, Archaeological, and Cultural Resources), 5.6.3 (Land Use), 5.7.3 (Natural Resources and Energy Supply), 5.8.3 (Noise and Noise-Compatible Land Use), 5.9.3 (Socioeconomics, Environmental Justice, and Children's Environmental Health and Safety Risks), 5.10.3 (Visual Effects), 5.11.3 (Water Resources), and 5.12 (Cumulative Impacts).

Response P.5-19

Please see Response to Comment P.5-13 for a discussion on assumptions concerning where vehicles would operate in the future and how LAWA could manage these facilities. The traffic methodology and assumptions utilized in the EIR for the LAX Landside Access Modernization Program are the same as the ones used in the Draft EA. As noted in Response to Comment P.5-13, while the traffic modeling made assumptions on where different modes would operate in the future, LAWA has not made any policy decisions restricting access to the CTA. LAWA would evaluate the impact on all passengers before enacting policy decisions, and utilize several methods to encourage passengers and employees to utilize the APM to access the CTA. Furthermore, the ITFs are being designed to accommodate a wide range of vehicles that include buses, shuttles, vans, limousines, Transportation Network Companies (TNCs, such as Uber and Lyft), taxis, and private vehicles. LAWA anticipates and recognizes that the use of these facilities will change over time as the transportation industry evolves.

The proposed LAX Landside Access Modernization Program provides LAWA the facilities and tools it needs to effectively manage traffic in the future. Specifically, the APM, ITFs, and CONRAC provide options for passengers and employees to access the CTA differently than they do today. Contrary to the commenter's claim, the traffic analysis does not conclude that the Proposed Action would reduce traffic flow by 48 percent; rather it assumes that 48 percent of *passengers* would access the CTA via the APM during peak hours. Approximately 20 percent of that peak traffic consists of rental car customers that would utilize the CONRAC. Thus, the traffic analysis assumes that another 28 percent of passengers and employees would use the APM stations at the ITFs during peak hours rather than driving into the CTA (this figure includes passengers and employees that would utilize the AMC 96th Street Transit Station and transfer to the APM). Due to the traffic congestion that exists within the CTA today during peak hours, when traffic routinely backs up onto Century and Sepulveda Boulevards and it can take in excess of 30 minutes to drive through the CTA, LAWA believes that it is reasonable to assume that

at least 28 percent of passengers and employees would choose to utilize the APM system rather than sit in traffic.

As noted in Response to Comment P.4-8, since 1987, LAWA has instituted a ground transportation permit program with rules and regulations, that authorize LAWA to execute Non-Exclusive License Agreements (NELA), and issue vehicle permits to operators of commercial vehicles transporting passengers to and from LAX. NELAs are routinely issued to qualified operators of Charter Party Carrier Transportation and Courtesy Vehicle Transportation Services, including TNCs such as Uber and Lyft, to and from LAX.

LAX is currently served by over 3,400 authorized Charter Party and Courtesy operators. In fiscal year 2014-15, more than 590 NELAs were issued. Each operator must satisfy all application requirements, which include applicable California Public Utilities Commission regulations, City Business Tax Registration, LAWA Insurance, and Department of Motor Vehicles registration. Each operator is required to abide by all LAX Rules and Regulations while operating at LAX. LAWA also has concession agreements with Commercial Ground Transportation (CGT) vehicles, which include taxis, rental car agency shuttles, hotel shuttles, off-Airport parking shuttles, and shared ride vans, who must also satisfy similar requirements.

To reduce congestion on the CTA roadways, LAWA would update the LAX Ground Transportation Permit Program to allow and/or require commercial operators to pick-up and drop-off passengers at the ITF East and ITF West. In addition, if necessary in the future, LAWA may restrict access to the CTA for some commercial operators, and/or evaluate pricing differential strategies to encourage commercial vehicle operators to pick-up and drop-off passengers at the ITF East and the ITF West.

Response P.5-20

Please see Responses to Comments P.5-2 with regard to the development of the Draft EA in compliance with applicable federal regulations, and P.5-13 and P.5-19 for a discussion on assumptions concerning where vehicles would operate in the future.

Response P.5-21

The comment is noted. Please see Responses to Comments P.5-2 through P.5-20 above.

Comment Letter P.6
Page 1 of 1

September 26, 2017

Evelyn Quintanilla
Chief of Airport Planning
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009

Subject: LAX Landside Access Modernization Program Draft Environmental Assessment – SUPPORT

Dear Ms. Quintanilla,

The Valley Industry and Commerce Association (VICA) strongly supports the Los Angeles International Airport (LAX) Landside Access Modernization Program (LAMP) as presented in the August 2017 Draft Environmental Assessment. The proposed action will enhance multimodal access to the airport, reduce traffic congestion, and improve air quality around the airport.

As one of the largest international airports in the United States, we must ensure that passengers and visitors have convenient, affordable, and reliable access to the airport facilities. Unfortunately, due to increasing demand, access to areas around the Central Terminal Area (CTA) have become severely congested.

In order to transform LAX into a modern airport, Los Angeles World Airports (LAWA) is committed to redeveloping ground access to the airport. These improvements will provide seamless connections to major highway and public transit systems, easing traffic and congestion for all Angelenos. Without a direct connection to Metro, a consolidated car rental facility and alternative modes of transit access to the CTA, businesses and local residents will continue to face heavy traffic congestion. P.6-1

LAX is a portal for economic investments throughout California and the world – local businesses rely on LAX to provide a connection to domestic and foreign markets. The project components – including the access to the Automated People Mover (APM), Intermodal Transportation Facilities (ITFs), Consolidated Rental Car Center (CONRAC) and a direct connection to Metro – will strengthen the region's economic standing and promote business growth throughout Southern California.

LAWA has made a good-faith effort to communicate with affected stakeholders, mitigate potential negative impacts, and put forward a strong proposal to ease traffic around LAX and promote economic growth. With LAX serving as the largest international gateway on the West Coast, VICA supports the proposed Landside Access Modernization Program to improve passenger quality-of-service and provide world-class facilities for its travelers.

Sincerely,

Kevin Tamaki
VICA Chairman

Stuart Waldman
VICA President

Valley Industry & Commerce Association • 16600 Sherman Way, Suite 170 Van Nuys, CA 91406 • phone: 818.817.0545 • fax: 818.907.7934 • www.vica.com

Response to Comment Letter P.6

Response P.6-1

The comment is noted.

Appendix P.5

Comment Letters

Los Angeles County
Metropolitan Transportation Authority

One Gateway Plaza
Los Angeles, CA 90012-2952

213.922.2000 Tel
metro.net

Metro

September 26, 2017

Evelyn Quintanilla
LAWA Environmental Programs Group
P.O. Box 92216
Los Angeles, CA 90009-2216

RE: Notice of Availability of Draft Environmental Assessment and Draft General Conformity Determination for the Los Angeles International Airport Landside Access Modernization Program

Dear Ms. Quintanilla:

Thank you for the opportunity to comment on the proposed LAX Landside Access Modernization Program (LAMP). This letter conveys recommendations from the Los Angeles County Metropolitan Transportation Authority (Metro) concerning issues that are germane to our agency's statutory responsibility in relation to our facilities and services that may be affected by the proposed Project.

Over the past several years, both Metro and Los Angeles World Airports (LAWA) have worked closely to provide a connection between Metro's regional transit system and LAX. The proposed connection includes LAWA's Automated People Mover (APM) System, which is planned as part of the LAMP. Metro and LAWA have been coordinating on parallel planning and development efforts for the Airport Metro Connector (AMC) 96th Street Transit Station and LAWA's APM Station, respectively. Because both projects will be built in close proximity and during the same time period, successful completion requires LAWA and Metro to collaborate and coordinate with respect to the design and construction of the planned transit stations, as well as roadway improvements, utility relocations, on-site work and other new accommodations in the immediate vicinity.

To ensure coordination and communication between the two agencies, Metro is providing the following comments on the LAWA's LAMP Draft Environmental Assessment (EA):

- *Design/Engineering Coordination of the APM Project:* As a continuation of current coordination activities, LAWA and Metro are striving to develop a mutually agreeable design that seamlessly connects passengers between the APM Station and the AMC 96th Street Transit Station. Both agencies need to ensure that the APM guideway structure and support columns do not conflict with the construction or operation of Metro facilities, including the Crenshaw/LAX Transit Project, the AMC 96th Street Transit Station, and the Southwestern Maintenance Yard.

- *Aviation Boulevard Roadway Improvements:* The LAMP EA identifies roadway improvements along Aviation Boulevard. Both agencies need to coordinate on the final configurations of the new driveways, intersections, and traffic signal phasing.

- *Multi-use Path on Aviation Boulevard:* There will be a multi-use path on the west side of Aviation Boulevard between Arbor Aviate Street and 98th Street. Both agencies need to coordinate on the funding, design, and construction of this multi-use path and its integration with the AMC 96th Street Transit Station.

- *Arbor Vitae Street:* The LAMP EA proposes roadway improvements on Arbor Vitae Street. Both agencies need to coordinate on the design, construction and its integration with the AMC 96th Street Transit Station.

- *Demolition of LAX City Bus Center:* For the enabling projects, the LAMP EA proposes demolishing the LAX City Bus Center. A temporary relocation of this facility is needed. As LAWA is aware, the new bus plaza planned as part of the AMC 96th Street Transit Station is intended to eventually replace the LAX City Bus Center. However, until the AMC 96th Street Transit Station is opened for passenger service, LAWA must work with Metro and other municipal bus operators to identify a temporary bus facility site that can accommodate the essential functions provided at the existing LAX City Bus Center. Furthermore, in order to ensure continuous, uninterrupted bus transit service within the LAX area, LAWA will need to coordinate with the bus transit operators, currently using the LAX City Bus Center, to ensure a seamless transition of services to this new temporary bus facility.

- *W. 98th Street Extension between Aviation Boulevard and Bellanca Avenue:* The construction of the 98th Street Extension may provide for the rerouting of bus transit service along W. 98th Street between the ITF West and the new AMC 96th Street Transit Station. As part of this improvement, please ensure that the design of the new signalized intersection at W. 98th Street and Aviation Boulevard will accommodate the turning movements of bus transit vehicles.

- *Operational Options on W. 98th Street:* LAWA should take into consideration the potential bus transit service planned for the ITF West and the new AMC 96th Transit Station.

Revisions to the EA text:

- Figure 2-4 (p. 85) is sourced to "Metropolitan Transit Authority." Please change it to "Los Angeles Metropolitan Transit Authority."

- Refer to Metro station at Aviation/96th Street as AMC 96th Street Transit Station consistently

- When referencing the Metro Rail lines at the AMC 96th Street Transit Station, the station would be served by both the future Crenshaw/LAX Line and the service extension of the Green Line

- Third Bullet point under Section ES. 2.3 (p. ES-5): Please include the AMC 96th Street Transit Station and Metro Green Line.

Metro looks forward to continuing our cooperative, working relationship with LAWA on our respective, but independent projects. If you have any questions regarding this response, please contact Derek Hull at 213-922-3051, by email at DevReview@metro.net or by mail at the following address:

Metro Development Review
One Gateway Plaza MS 99-18-3
Los Angeles, CA 90012-2952

Sincerely,

Derek Hull
Manager, Transportation Planning

From: deldorsey@everfieldconsulting.com
To: LAX Stakeholder Liaison
Subject: Stakeholder Comment Submitted - Ref. No. 170919200724
Date: Tuesday, September 19, 2017 8:07:36 PM
Attachments: ATT00001.bin

This is to inform you that a comment from OURLAX.ORG website was submitted.

It may not reflect on the excel file yet the current submitted form as the file is being updated every end of the day.
Here is the link to the excel file \\slaxVBfiler01\enterprisedev\reports\laxmp

Reference No.:	170919200724
Date Submitted:	9/19/2017
From:	Delbara Dorsey
Email:	deldorsey@everfieldconsulting.com
Company Name:	Everfield Consulting, LLC
Address:	
City:	
State:	
Zip Code:	0
Project Name:	LAMP - Draft EA
Other Comments:	Outstanding workshop format Allison Sampson was extremely helpful in sharing EA details. the brochures by DAKOTA communications where impressive, easy to read and highlighted key facts.

IP Address: 198.140.114.253

From: virgil.sevilla@gmail.com
To: LAX Stakeholder Liaison
Subject: Stakeholder Comment Submitted - Ref. No. 170919181945
Date: Tuesday, September 19, 2017 6:19:58 PM
Attachments: ATT00001.bin

This is to inform you that a comment from OURLAX.ORG website was submitted.

It may not reflect on the excel file yet the current submitted form as the file is being updated every end of the day.
Here is the link to the excel file \\slaxVBfiler01\enterprisedev\reports\laxmp

Reference No.:	170919181945
Date Submitted:	9/19/2017
From:	virgil Sevilla
Email:	virgil.sevilla@gmail.com
Company Name:	
Address:	1100 E. Imperial Ave
City:	El Segundo
State:	ca
Zip Code:	90245
Project Name:	General Comment
Other Comments:	Thank you for hosting a very informative public workshop. We appreciate the refreshment, hospitalities...Hope it will be a successful transition to the actual construction. I was hoping for a major improvement at the Sepulveda tunnel that runs under the runway, a safe way for pedestrians to traverse that tunnel. I have some suggestions, my contact number is 310-780-4961. Again, thank you so much.

IP Address: 198.140.114.253

From: hguz58@gmail.com
To: LAX Stakeholder Liaison
Subject: Stakeholder Comment Su m itted - Ref. No. 170919200342
Date: Tuesday, Septem er 19, 2017 8:03:54 PM
Attachments: ATT00001. in

This is to inform you that a comment from OURLAX.ORG website was submitted.

It may not reflect on the excel file yet the current su mi tted form as the file is e ing updated every end of the day.
Here is the link to the excel file \\slaxVBfiler01\enterprisedev\reports\laxmp

Reference No.:	170919200342
Date Su mi tted:	9/19/2017
From:	Henry guzman
Email:	hguz58@gmail.com
Company Name:	
Address:	8731 Lilienthal ave
City:	LA
State:	CA
Zip Code:	90045
Project Name:	General Comment
Other Comments:	I see that the airport facilities will e moving closer to the neigh orh oods North of Westchester Parkway. There is already a pro l em with airport employees parking in the neigh ori ng streets at all hours and walking in to work, part of the area has had to go to permit parking to com a t this issue at a cost to them. Are there any provisions in your plan to keep this from continuing and growing. I also notice that your presentation hails this project as improving the conditions for the passengers, ut I do NOT see anywhere where you tout anything good for the people that live in the neigh ori ng areas, why is that

IP Address: 198.140.114.253

From: Frank Mastroly
Sent: Saturday, September 23, 2017 2:37 PM
To: QUINTANILLA, EVELYN
Subject: Comments on LAX LAMP Draft Environmental Assessment and Draft General Conformity Determination

Comments on LAX LAMP Draft Environmental Assessment and Draft General Conformity Determination

http://connectinglax.com/informed.html

Presented below are my comments on Draft Environmental Assessment & Draft General Conformity Determination. Please note that this LAWA document is difficult to locate on the Connecting LAX website http://connectinglax.com/ . It is buried under NEPA which in turn is under Project Documents.

These comments supplement comments made in numerous e-mails to Ms. Evelyn Quintanilla, Chief of Airport Planning, and thus should be read in conjunction with these other documents, especially my e-mail of July 14, 2017 entitled "Comments on LAMP Report 2017-0276_misc_05-12-2017." Admittedly this current document expresses many of the same comments I have had previously but which to date have not been addressed. However, time constraints do not permit me to write a composite unified document.

I have read in detail the subject and have several comments. I have also downloaded and read in detail all recent and previous Las Angeles World Airways (LAWA) documents on the proposed Landside Access Modernization Program (LAMP) including the LAMP DEIR and FEIR, and going back to the 2004 Master Plan and various revisions and amendments. I am also very familiar with various other proposed and in progress projects such as Terminals 1.5, 2.5, and 3.5, and the Midfield Satellite Concourse (MSC), and how they all relate to the LAMP. Finally, I have downloaded and read numerous Los Angeles Metropolitan Authority (LA Metro) documents on their proposed W. 96th Street/LAX station at http://www.metro.net/projects/crenshaw_corridor/ as well as being on distribution of LA Metro "Source" documents and numerous readers' comments related to this station.

Thus, I consider myself very familiar with what has been proposed in the past and what is planned for the future. In general, my comments are directed at specific items in the subject report referenced by paragraph, figure, or table number, including links to various related LAWA and LA Metro documents.

Table 1-2, Item 4 - Recirculation Ramps Demolition -- Nowhere in the document do you discuss what will, if anything, replace these ramps. Although LAWA wants to discourage automobiles from continuously circulating the Central Terminal Area (CTA) in search of an available parking slot, there will always be a need for these ramps, especially if motorists are confused on which level arriving passengers may be waiting during peaks periods.

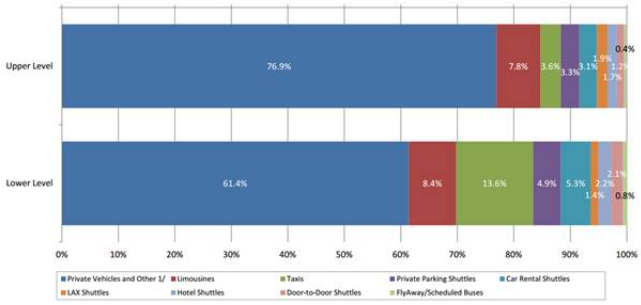
Table 1-2, Item 29 - W. 96th Street Improvements -- Here you propose widening and restriping W. 96th Street to maintain one travel lane plus parking in each direction to permit the construction of the Automated People Mover (APM). However, you reject routing the APM along W. 98th Street ***because*** it has only one travel lane plus ***some on-street*** parking in each direction.

Table 1-2, Item 31 - W. 98th Street Extension, Bellanca Ave. to Aviation Blvd. -- Just a perfect location to have the APM curve north from W. 98th Street to be directly over Aviation and have its station directly above the LA Metro Station W. 96th Street Station where it belongs.

Paragraph 2.3.2.2, Roadway Access -- There is no doubt that there needs to be improved ***passenger*** (***and not just automobile***) access to and from the CTA. However, nothing in the LAMP as currently envisioned will preclude the problem of well-wishers continually circulating the CTA roadways until their party arrives at curbside for pickup. This is because most travelers will prefer to wait curbside rather than walking up to 1,000 feet more to reach a pick-up point. This will be especially true for passengers with several pieces of luggage, those traveling with or carrying small children, and those who are mobility impaired. Nowhere in any LAMP documentation is this discussed or how these negatively impacted passengers will be accommodated.

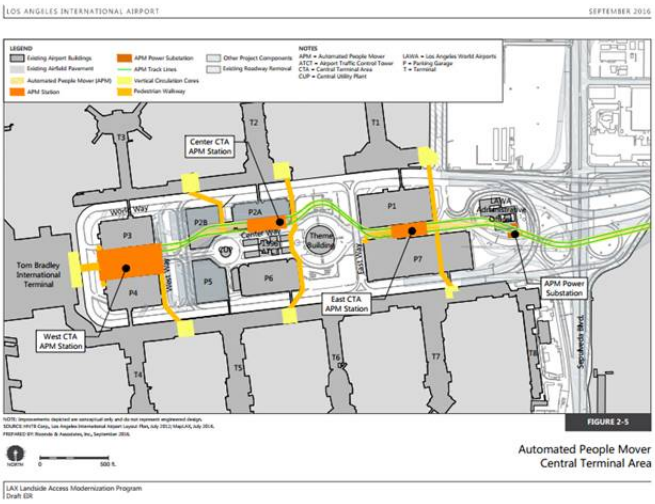
In particular, the curbside congestion problems at Terminal 1 should be alleviated once Terminal 1.5 is operational. If that does not occur, then T1.5 will fail to accomplish one primary objective for it. Or does the LAMP simply ignore the future presence of Terminals 1.5, 2.5, and 3.5? If so, then all LAMP documents going back to the DEIR should be revised to reflect these future additions. Not related to LAMP, but will Terminal 1.5 simply ***supplant*** existing check-in and baggage claim facilities in Terminals 1 and 2, or will it ***supplement*** existing facilities in T1 and T2? Similarly, will Terminal 2.5 replace existing facilities in Terminals 2 and 3 now that Delta Airlines is the major tenant in both terminals? Finally, what specific function will Terminal 3.5 perform? It appears to be redundant.

Figure 2.3 (reproduced below) clearly illustrates why LAMP may fail in its primary objective of alleviating automobile congestion in the CTA. The private automobile traffic that currently contributes, 77% and 61%, respectively, of total Upper and Lower Levels total vehicular traffic will not be materially reduced by LAMP because of the attendant longer walks required by the locations of the APM stations in the CTA. In addition, I am sure that the various off-airport commercial parking facilities will get around any shuttle restrictions by merely shuttling their customers to and from the CTA using the customer's vehicle. In addition, there probably will be fleets of Uber and Lyft vehicles at the Intermobile Transfer Facilities (ITFs) and the LA Metro W. 96th Street Station offering low cost shuttle service to and from the terminal curbsides. In fact, the LAMP apparently does not restrict these Transportation Network Companies (TNCs) having unrestricted curbside access, a major deficiency of LAMP.



Below is Figure 2-5 of the LAMP DEIR showing the proposed APM CTA route, stations, and the passages to and from the various terminals. It is obvious now that the East CTA Station will no longer serve Terminal 1 with the construction of T1.5. Instead, T1.5 will be better served by the Center CTA APM Station which will also serve T2.5 and T4.5 (if there is one). Finally, this figure does not show T3.5 or a passage between it and the East CTA APM Station. To

maximize passenger convenience, there should be individual passages for T4, T5, and T6 in line with the center of the respective ticketing and baggage claim areas. I realize that this figure is illustrative only and does not reflect the final configuration. However, the various walking distances will be impacted and need to be documented. These distances need to include not only the lengths of the various passages, but also total walking distances between the Vertical Circulation Cores and the ticketing and baggage claim areas within each terminal. Those who still have unrestricted curbside access can pick and choose which terminal door they use and thus minimize their walking distance. Not so for the APM users.



Paragraph 2.3.4. Rail Access -- LAWA is correct in decrying the current lack of regional rail access to LAX. However, the proposed LA Metro LAX/W. 96th Street station is estimated by LA Metro to handle less than 1,800 daily passengers, or approximately 0.7% of total LAX passenger traffic, a proverbial "drop in the bucket". In fact, the need to ride conventional LRT vehicles that don't have amenities to attract passengers with baggage and the need to transfer between two LRT lines will probably restrict usage of this LA Metro station to those passengers without baggage or not traveling with small children, and airport employees, this limiting the attractiveness of this option. In addition, both the LRT and APM will have to operate 24/7 to attract all airport employees.

This compares with over 11% of total JFK traffic carried by their AirTrain to and from Queens, Brooklyn, and Manhattan via two routes (subway and the Long Island Rail Road or LIRR). In addition, the rail services to JFK, SFO. ORD, DFW, ATL, PHL, etc. all provide ***one-seat*** service to and from the respective downtown areas, while the LA Metro service will require at least one intermediate transfer (Blue/Green) for passengers going to or from Downtown LA and Union Station. In fact, at PHL, the SEPTA commuter rail line serves each individual terminal, thus eliminating the need for passengers to transfer to an APM to reach their respective terminal.

The connection between the Expo and Crenshaw lines will be especially inconvenient because the former is elevated and the later is in a subway, requiring two elevation changes. Also, the APMs at SFO, JFK, ORD, etc., all serve each terminal individually, without the need for walks as long as 1,000 feet. It is an insult to the APM systems in place at other US airports to compare them with what is proposed at LAX. They are not in any stretch of the imagination even closely identical.

Paragraph 3.2.5.1 and Appendix E, APM Alignment -- Here we get to what may very well be the Achilles Heel for the LAMP program as currently envisioned. You state that the average total APM travel plus additional walking time will be approximately 14 minutes. Nowhere does LAWA admit that this increases this parameter from its ***current value of zero***, but this fact is conveniently omitted in all LAWA LAMP documents. Nor does LAWA even mention that the longest value would be several minutes longer, perhaps up to 20 minutes, due to the longest walking distance being ***almost 1,000 feet*** vs. an average of ***only*** 690 feet, another fact conveniently omitted in the subject document.

It must be noted here that this document is the ***very first LAMP document to even admit that the LAMP as currently envisioned will add to the total travel time*** for those passengers who will be restricted from enjoying the unrestricted terminal curbside access they currently enjoy. Thus, to be realistic, all passengers not traveling in private automobiles should add 20-30 minutes to the recommended arrival time at LAX before scheduled boarding (not departure) time.

Per http://www.laxishappening.com/news/top-10-summer-tips.aspx it is currently recommended that departing passengers arrive at LAX 2 hours prior to scheduled ***boarding*** (***not departure***) time for domestic flights and 3 hours prior to scheduled ***boarding*** (***not departure***) time for international flights. Thus, these total recommended times will now be almost 3 hours for domestic flights and almost 4 hours for international flights for those passengers using shared ride vans, hotel shuttles, rental cars, commercial off-airport parking facilities, or public transportation, including LA Metro trains or your FlyAway service. This must be stated in all LAWA LAMP documentation and ultimately on the LAX website.

See http://thesource.metro.net/2014/06/26/metro-board-approves-new-station-at-aviation96th-as-best-option-to-connect-to-lax-people-mover/ for a sample of comments, e.g., Comments 1, 13, and 25, by others of the inadequacy of the proposed CTA 3-station spine APM configuration. Then there is Comment 46 wondering why the APM is not routed to the Aviation/Imperial station, thus eliminating the need for the LA Metro W. 96th Street LAX Station. Of course, this is consistent with my suggestion of routing the APM over Manchester/Firestone to the Blue Line Firestone, thus providing a ***one-seat service*** to and from Downtown LA and Union Station.

Considering that the projected LAMP cost is over $5 Billion, this would be a relatively small percentage cost increase, particularly if this added cost is split with LA Metro. In particular, per http://thesource.metro.net/2016/12/01/final-study-approved-for-transit-station-to-connect-metro-rail-to-lax/ it is reported that LA Metro will spend approximately $600 Million to build the W. 96th Street/LAX station complex. If, instead, this $600 Million were spent on extending the APM to the Blue Line Firestone Station, this may attract more than the paltry 0.7% projected traffic for the LAX station. As noted above, the JFK AirTrain carries 11% of JFK traffic via ***two*** offsite stations that connect it directly to subways and the LIRR for ***one-seat service*** to Queens and Manhattan. Why not LAX?

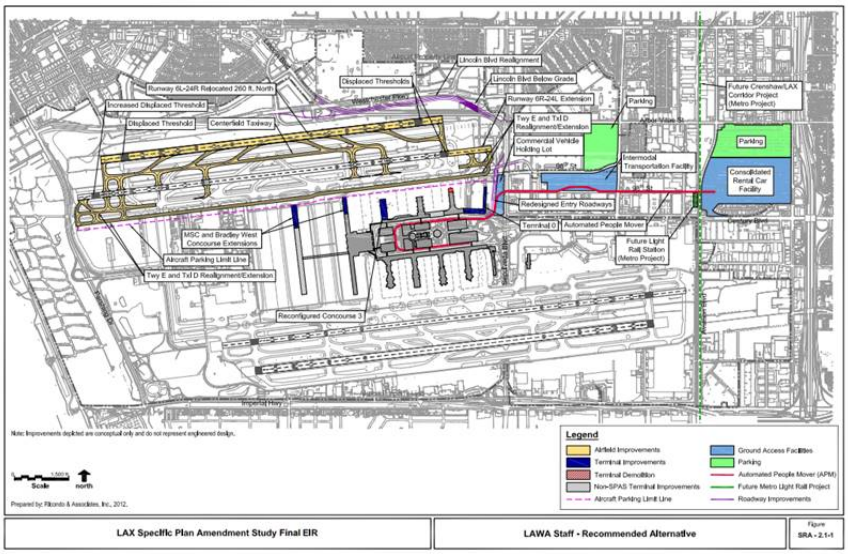
Other germane comments can be found in http://thesource.metro.net/2014/06/16/metro-staff-recommends-new-light-rail-station-at-aviation96th-street-to-connect-to-future-lax-people-mover/ , http://thesource.metro.net/2013/10/09/connecting-metro-rail-to-los-angeles-international-airport-here-is-a-look-at-issues-currently-on-the-table/, and one by Y Fukuzawa in http://thesource.metro.net/2011/03/23/study-on-better-connecting-lax-to-metro-rail-to-be-considered-by-metro-board/ “One thing they could do right now is to start consolidating the redundant shuttle buses that clogs up the traffic at LAX. You have a shuttle bus that goes to the Parking Spot in Century and another shuttle bus that goes to Hilton LAX right next door to it. And these shuttle buses make stops at every terminal, yet you cannot use them as terminal connections because there’s another shuttle for that. All these redundant buses add up to more traffic which otherwise could just be consolidated into one longer bus”.

Then there https://www.thetransportpolitic.com/2012/03/09/for-l-a-how-to-build-an-airport-rail-connection-that-makes-sense-for-passengers/ in 2012 which discussed several options to both LAWA and LA Metro on improving access to LAX. On commenter’s suggestion was to route the APM not only to ***all terminals*** (my emphasis) and the CONRAC, but also to key hotels in the immediate vicinity of LAX. Thus, it is obvious to yours truly that there are many persons besides myself out there who are well informed and thus have very good ideas that need to be explored and evaluated.

(On a minor point, for the one CTA station option, headways would need to be *decreased*, not *increased* to accommodate the increased passenger load. By definition, headway is the reciprocal of frequency. Lower headways mean more trains per hour.)

Admittedly, having an APM station at each terminal would increase APM travel time. However, the added walking time would now be zero and thus the ***total travel times*** would obviously be less than those associated with the 3-station spine configuration.

Table 3-1, "Build" Alternatives Summary -- Nowhere do you mention that Figure SRA-2.1-1 "LAWA Staff - ***Recommended*** Alternative" of the Specific Plan Amendment Study (SPAS) (reproduced below) included construction of a Terminal 0 and recommended a hook configuration for the CTA APM serving Terminals 0-8, with between 3 to 5 stations within the APM. It also showed the APM routed over W. 98th Street and a single Intermodal Transportation Facility or ITF. It also assumes the construction of a Century Blvd. Station on the LA Metro Crenshaw/Green Line. This station will still be built but with an additional station at W. 96th Street. All current LAMP documentation must address in detail these differences from previous recommendations and the rationale for deviating from them.



These differences between the SPAS and the LAMP are conveniently not shown on Figure 3.3 or discussed anywhere in the subject report but definitely should be for the sake of completeness. Perhaps they conveniently are not, as they would simply raise the questions that I and numerous other commenters have raised.

Paragraph 3.2.7.1, APM Alignment -- Here you mention that the APM would be routed along W. 96th Street instead of along W. 98th Street as recommended in the SPAS. If W. 98th Street was OK then it should be OK now. To me, having the APM perpendicular to the LA Metro station and the station offset to the east is far less convenient for passengers than having the station directly above the LA Metro station which would be possible with a W. 98th Street alignment. This would be similar to the arrangement between BART and the SFO AirTrain, and could even induce more LA Metro patrons to use the rail station vs. the paltry 0.7% estimated by LA Metro.

Paragraph 3.2.7.2, Intermodal Transportation Facilities (ITFs) -- Since the two ITFs are essentially identical and provide essentially identical services, I feel that one planned ITF, say ITF-East, should simply be a conventional off-CTA parking structure. (Note that the SPAS also recommended a single ITF). In particular, I note that both ITF-West and ITF-East are planned to accommodate public transit buses. This is redundant, as this service will also be provided by the bus plaza adjacent to the LA Metro W. 96th Street Station. Thus, arriving passengers not that familiar with LAX would be thoroughly confused as to which of the THREE (including the LA Metro bus plaza) to use to complete their journey. In short, this paragraph does not adequately provide the justification for having ***three*** essentially identical facilities.

In passing, your Figure 2.4 shows only ITF, not two. I note too that Table 3.1 gives no credit to the SPAS having only one ITF and instead did not consider the obvious addition of a

conventional multi-level off-CTA parking structure. Thus, LAWA set up a straw-man they could shoot down to justify having redundant ITFs.

In this paragraph, you also state that the ITFs ***may*** include baggage check facilities and ticketing kiosks to make these facilities convenient alternatives to the CTA. To give LAMP any chance of success, these facilities, along with Sky Cap Service, MUST be provided at ALL ITFs, the CONRAC, and the W. 96th Street LA Metro station. Similar services ***must*** also be provided at all baggage claim areas so that the passengers will be unencumbered with baggage at both ends of their journeys. This must be addressed in all LAMP documentation.

Paragraph 3.2.7.3, CONRAC Facility -- My only problem here, again, is very inconvenient access to the CTA. My guess here is that the major rental car agencies will establish "work arounds" to save their customers the 14 to 20-minute delays and long walks associated with getting to and from the CONRAC.

Paragraph 3.4 and Table 3-6 - Evaluation Results

A. *Would the Alternative Improve Access Options and The Landside Travel Experience for Passengers?*

A-1, for Paragraph 3.4.3 Use of Other Airports Alternative. Here I suspect that by making LAX less convenient for those passengers now denied the unrestricted curbside access they currently enjoy, such as those using shared ride van services, they may very well be tempted to use LGB, BUR, ONT, or SNA, even if the fares are higher. I know that this would definitely be my preference for domestic flights. Since I live in Huntington Beach, either SNA or LGB or even ONT would be my airport of choice for any flight, even international, since I can reach SFO, DFW, ATL, or JFK from SNA or LGB. Note too that BUR is currently building a new terminal to replace the one originally constructed on the 1930s.

A-2, for Paragraph 3.4.7, Proposed Action Alternative. The proposed action would most likely enhance access options and the landside travel experience ***but only for*** those passengers who currently arrive at and depart from LAX in private automobiles, as there should be less CTA congestion, at least in the short term. ***However***, this cannot be said for those who currently use shared ride vans, hotel shuttles, public transit, and even your LAWA FlyAway service, because now these passengers will have to endure an additional 14-minute average, or maybe 20 minutes or more, APM plus walking time vs ***zero time*** and ***zero additional walking distance*** today.

This will be especially inconvenient for those passengers with several pieces of luggage, traveling with small children, and those, such as yours truly, with mobility issues. Those using the LA Metro W. 96th Street Station will not be immune from this additional travel time. In particular, those using LA Metro from Union Station or Downtown LA will have to transport their luggage up or down an elevator and walk some distance at both ends to make the Blue-Green Line transfer at Rosa Parks. In addition, based upon current LA Metro timetables, this trip will take over an hour from Union Station or downtown LA because of uncoordinated Metro timetables for the Blue and Green Lines. As noted above, the trips between JFK and Manhattan take approximately 25 minutes using the LIRR or 40-60 minutes if using the subway.

I suspect the LAWA engineers already know this, but in case they don't, the JFK AirTrain is discussed at https://www.panynj.gov/airports/jfk-to-from.html. There is also a YouTube video of an AirTrain ride at JFK at https://www.youtube.com/watch?v=O8-SoGXU9H8. Another YouTube video at https://www.youtube.com/watch?v=kG64kC8XIR8 shows how to use the JFK AirTrain and subway to reach Manhattan. Finally, there is a YouTube video at https://www.youtube.com/watch?v=nqdnRFWh93E which shows how to use BART at SFO. LAX really needs this to do the job right.

I am still waiting for ***documented proof*** that adding 14 to 20 minutes and long walks will enhance the travel experience of those passengers negatively impacted by LAMP. So far not a word from anyone at LAWA about how to accommodate these impacted passengers at

LAX. Without such proof, the honest answer to this question must be **NO!** for all alternatives, even the Proposed Action Alternative

B. -*Would the Alternative Provide a Direct Connection to The Metro Rail and Transit System*? Obviously, it goes without saying that this would be positive for all alternatives ***assuming*** the APM serves each LAX terminal **and if** the APM station is located directly above the LA Metro rail station. However, forcing the LA Metro patrons walk longer distances just to get to the APM station plus the additional 14 to 20-minute APM travel time plus additional walks decreases the desirability of this option. If not, as before, the honest answer to this question must be **NO!** for all alternatives, even the Proposed Action Alternative.

Please note too that the ITF-East APM station is distinct from the CONRAC APM Station.

C. *Would the Alternative Improve Connectivity and Mobility for Airport Passengers, Visitors, And Employees?* -- Obviously this is true only for those passengers arriving or departing LAX in private automobiles, but not for all passengers. This would be true ***only if there were only one ITF and if it as well as the CONRAC and LA Metro W. 96th Street Station were connected directly to each CTA terminal via the APM***. If not, as before, the honest answer to this question must be **NO!** for all alternatives, even the Proposed Action Alternative.

D. Would the Alternative Be Feasible to Construct Within the Physical Constraints of The Airport Environment? I admit that constructing the APM to have stations immediate adjacent to the various terminals will obviously have several negative and significant impacts because of the existing two-level roadway. As you already know, the present LAX layout was initially conceived in the 1960s with only the lower roadway, with the upper roadway constructed in 1980 in anticipation of the 1984 Olympics. It is obvious now that LAWA made the wrong choice in 1980 when it chose to construct the upper roadway in lieu of an APM.

In essence, LAWA is now admitting this mistake but also compounding it by developing a LAMP that apparently prohibits those vehicles carrying several passengers in favor of those vehicle carrying only one, or maybe two, passengers. It should be noted that by 1980 several major US and International airports had already installed an APM and thus the technology was available. Instead, LAWA adopted the **Automobiles YES, Mass Transit NO!** philosophy that even now is obviously evident as the unstated underlying design basis for the LAMP project.

The primary adjective of LAMP should be to enhance the experience of ***all passengers***, and not just a percentage of them, irrespective of their share of the total. In previous LAMP documentation, LAWA expresses that one objective of LAMP is to "*Enhance* ***passenger experience*** *by providing new options for pick-up and drop-off at the airport*." This has been reworded to say, "*Improve Access Options and The Landside Travel Experience for Passengers."* At least LAWA does not have the audacity to add ***all*** in front of ***passengers***. These "new and improved" access options for pick-up and drop-off" ***are definitely not optional but are, in fact, mandatory*** for a significant fraction of LAX passengers whose overall experience will definitely be degraded, a fact conveniently never mentioned or admitted to in any LAWA LAMP documentation.

To be honest, LAWA should own up to this and offer alternatives for these adversely affected passengers, such as providing free shuttle service to and from the terminal curbsides irrespective of off-CTA origin or destination or how they travel to and from LAX. These shuttles would, on each trip, serve all off-CTA parking facilities, the CONRAC, the one-and-only ITF, the W. 96th Street LA Metro station and all CTA terminals in a circular route.

This would result in only one shuttle bus line carrying many passengers in lieu of several shuttles, and probably reduce CTA congestion and possibly even make the building of an APM moot. As noted in one comment in http://thesource.metro.net/2011/03/23/study-on-better-connecting-lax-to-metro-rail-to-be-considered-by-metro-board/, a multiplicity of shuttle buses instead of a single shuttle bus route contributes to the CTA traffic congestion, and consolidating

the numerous shuttles into one route could help alleviate this congestion even without the LAMP or APM.

With the prospects of increased airline traffic coincident with the 2028 Olympics, LAX must make its facility as convenient as possible for ***all passengers and just not for some***, and the 3-station APM alignment with only three CTA stations and long walks falls woefully short when it comes to enhancing the convenience of ***all passengers***. This will be apparently obvious in 2028 when a large percentage of LAX passengers probably unfamiliar with LAX will be obliged to add an additional 14 or more minutes to their trip only for the "honor" of enduring walks of to 1,000 feet going to and from their terminals.

That is why I, and numerous other commenters, have suggested replacing the upper roadway with the APM. As noted by others, due to the relative closeness of the terminals, LAWA could probably get by with six CTA APM stations, (T1.5, T2.5, T3.5/TBIT, T4/5, T6, and T7/8), even though this would introduce some additional walking that could be alleviated by moving sidewalks. Since T3.5 appears redundant to T2.5 now that Delta Airlines occupies Terminals 2 and 3, the T3.5/TBIT APM station could be immediately adjacent to the TBIT. (As noted above, it appears now that the T3.5 is redundant and perhaps is not really needed.) Also, since American Airlines now occupies Terminals 4 and 5, perhaps a Terminal 4.5 could be constructed and served by a single APM station as noted.

I take particular exception to your selecting W. 96th Street for the APM route vs W. 98th Street as recommended on Figure SRA-2.1-1 in the SPAS. This is because I contend that the APM station platforms should be parallel to and directly above the LA Metro rail station platforms to maximize passenger convenience, something that is sorely lacking in the present LAMP design. Using the "Street View" option of Goggle "Earth," I concur that W. 96th Street is generally wider than is W. 98th Street. However, W. 96th Street curves south to become Bellanca Avenue, and the APM would have to be dog-legged around a large building and routed across a parking lot before reaching Aviation Blvd and the LA Metro Crenshaw Line right-of-way. Also, there is considerable on-street parking on both sides of W. 96th Street that could be adversely impacted by the APM.

On the other hand, even immediately west of Bellanca Avenue, W. 98th Street does appear wide enough to support an elevated APM supported by single columns in the center of the street without adversely impacting traffic or the adjacent buildings, considering there would not be any stations and minimal on-street parking along this portion of the route. Alternately, the APM support columns could be on the sidewalks, thus leaving the street open to automobile traffic and on-street parking..

In addition, it appears that the buildings on the south side of W. 98th Street all have vehicle entrances on W. 98th Street, while on the north side, including two buildings that have off-street loading docks, there is essentially only off-street parking. Thus, none of these facilities appear to require on-street loading facilities. In addition, there are alleys alongside and behind all these buildings, all of which are accessible from W. 98th Street that could be used for such access. In addition, there are numerous no-parking signs on both sides of 98th Street that prohibit on-street parking and loading and unloading, in contrast to the situation on 96th Street on which on-street parking is permitted.

East of Bellanca Avenue, the only obstruction to using W. 98th Street appears to be a surface parking lot for WallyPark, a commercial airport parking vendor. Thus, it appears that the APM support columns could be implanted in this lot with minimal modifications. Immediately east of this parking lot is the former Santa Fe (now BNSF) Harbor Subdivision right-of-way that will soon become the Crenshaw/Green Line right-of-way, thus permitting an APM left turn from W. 98th Street and thus be directly above the Crenshaw/Green Line and parallel to and directly above the W. 96th Street/LAX Station platforms. Thus, I see distinct advantages and no "showstoppers" associated to routing the APM over W. 98th Street in lieu of over W. 96th Street.

E. Will the Alternative Maintain Access to And Within the CTA And Passenger Terminals? Obviously an APM replacing the upper roadway and serving all terminals will

have a major impact during construction but should improve the access to and within the CTA and passenger terminals once operational. That is why I suggest a staged construction process, where the single ITF, the CONRAC, all off-CTA parking structures, and the LA Metro Station all be fully operational before any APM-related demolition and construction is started. While the upper roadway is demolished and the APM constructed, free frequent shuttle service would be provided between all CTA terminals and the various external facilities. In addition, the north and south CTA portions would be worked on individually, with the cross-CTA roadways used to access the terminals being impacted by adjacent construction. As is true for all major projects, "Where there is the will, there is a way".

It must be noted here that the demolishment and reconstruction of the Terminal 3 Concourse will obviously have a significant negative impact of airport operations during construction. In Paragraph 2.5 of the Terminal 2/3 DEIR, LAWA admits this and states that this would be mitigated by "phased gate closures and shuttle transportation of passengers and employees." To me this statement is insufficient and needs to be fleshed out. In particular, what terminal gates will used when Terminal 3 gates are unavailable. Will passengers be transported to other terminals, including those on the south side of the CTA? How will well-wishes learn where to pick up their party? Will these shuttles be similar to those at IAD, or will passengers have to descend and climb stairways to move between the terminal and their airplane? Same with transfers to and from the Midfield Satellite Concourse. Unfortunately, this was not addressed in any comments or responses in the T2/T3 Final EIR. We need more thinking when it comes to reconsidering the route of the APM within the CTA.

F. Does the Alternative Enhance Efficiency and Alleviate Delays and Congestion of On-Airport and Surrounding Roadways? The apparent assumption that the LAMP provisions of alternative drop-off and pick-up points will induce some travelers formerly accustomed to curbside access to use these various points is very unrealistic, especially if this increases the travel time and requires more walking for those who choose this option. I don't think that a significant portion of departing and arriving passengers currently using private automobiles will choose to be dropped off or picked up at an ITF only to have to arrive as much as 20-30 minutes earlier and walk considerable distances. If this is in fact the case, and with no supporting documentation provided to prove otherwise, the honest answer to this question must be, as before, **NO!** for all alternatives, even the Proposed Action Alternative.

In short, for ***any major transportation project***, which the LAMP essentially is, the overriding success criterion should be that it benefits ***all those who choose to use the new facility without any detrimental impact*** on those who ***for any reason*** cannot use or choose not to use the various new facilities. There obviously can be winners, but ***there must be no losers***. If this criterion is not satisfied, the project must be deemed a potential failure, and partial success at the expense of others is not a valid reason for proceeding with a major $5+ Billion transportation project.

Paragraph 4 - Affected Environment, and Paragraph 5 - Environmental Consequences

This comment also applies to Appendices F, J, K, and L. Since I am not an environmental engineer, I cannot comment on specific items in this paragraph or the various related appendices. However, any estimates of the impact of the LAMP must assume that all private automobile traffic currently using the CTA will persist as the LAMP is developed as currently envisioned and will increase in time as the LA area population and the demand for air transportation increases such as during the 2028 Olympics.

In short, it is unrealistic to assume that somehow some of those passengers currently served by well-wishers will somehow chose to be dropped off or picked up at an ITF. (This analysis should also reflect the possible deletion of one ITF and its replacement by a conventional parking structure.) In addition, this analysis should assume that some passengers using various off-site facilities will be accommodated in the CTA, as various commercial facilities develop work-arounds to transport their customers to and from the terminal curbsides. It should also

assume that some passenger traffic to and from the LA Metro Station and the ITF(s) will use a TNC vehicle (Uber or Lyft) in lieu of the APM.

Also, should the APM be routed to serve each terminal as it should be for maximum passenger convenience, the Construction and Visual Impacts of Paragraph 5.5.3.2 will obviously have to be revised. In contrast. if the spine APM configuration is selected, the impacts of the various passages will still need to be revised due to the construction of Terminals 1.5, 2.5, 3.5 and perhaps 4.5. In particular, Figures 5.8 and 5.9 show clearly the eyesore that the proposed APM spine routing will be. In passing, it should be noted that routing the APM above the lower roadway to serve the individual terminals will leave the Theme Building unaffected. A definite plus.

Paragraph 5.3.6.2.2, *Construction and Operational Impacts on the* City *of Los Angeles* - Has the City of Los Angeles been notified on the potential impacts on Mobility Plan 2035?

Table 5-35 -- This table should be revised to include Terminal 2.5 and, perhaps, Terminal 3.5, as these terminals will impact the design and usage of the APM and passages.

As for airside access, I realize that the LAMP only addresses landside access. However, according to several comments in a recent Skytrax passenger satisfaction survey, the lack of interterminal airside access was a factor in downgrading LAX. I note that, in a March 16, 2017, Press Release, LAX "boasted" that Los Angeles International Airport (LAX) has been named one of Skytrax's 2017 "Top 10 Most Improved Airports." However, this LAX Press Release also correctly noted: "Out of 100 top airports, LAX moved from No. 91 to No. 86", with the 10th best improvement in overall ranking. I don't want to sound cynical, but to me going from Number 91 to Number 86 is like a kid bragging to his parents about his overall report card grade improving from a ***C-Minus*** to a ***C***.

To add my two cents here, improved airside access should be part of any LAX modernization project, as the two-combined affect the passenger experience, even if only 25% of airport users are impacted. In the Skytrax report, several comments were to the effect that landside and airside access modernization environmental impacts cannot be separated but must be addressed as part of a total package. Note that ATL and IAH have both landside and airside APMs.

I am fully aware that the present CTA terminal arrangement makes it very expensive to improve landside and airside access. Those US airports with superior ground access such as JFK, IAH, PHL, ATL, SFO, etc., are more spread out and thus more suited for an APM that serves each terminal individually. Also, they don't have parking structures within the terminal area as does LAX. However, does starting with a design such as at LAX preclude not doing everything possible to improve access? I think not. Again, "If there is a will, there is a way".

As for the future, the much-maligned LGA (La Guardia) is currently undergoing a complete renovation, including new terminals ***and*** the construction of an AirTrain similar to that at JFK connecting LGA to a subway station that will provide *one-seat* rail service to and from Manhattan. Assuming these LGA projects do what they are supposed to do, it would not be a surprise if LGA joins JFK, SFO, ATL, IAH, DEN, DFW, etc., in outranking LAX in overall customer satisfaction in 2023 and later. EWR (Newark) and ORD (Chicago) are getting new APMs, and both airports could conceivably rank higher than LAX in future years. Such an occurrence would be unflattering to those responsible for the LAMP design.

Despite its stated goal of achieving World Class status, LAX may most likely become "***world famous***" and "***noteworthy***" for its ***unique design features*** such as:

- ***Having an APM that does not serve each terminal individually***, thus requiring excessively long walks, with no mechanized alternative for a significant percentage of airline passengers
- ***Not having direct one-seat rail passenger rail access service*** to and from the respective downtown area

- ***Having multiple Intermobile Transfer facilities*** causing confusion among arriving passengers as to which one they should use to complete their journey
- ***Nonexistent airside transfer facilities*** (DFW has an airside APM with 2 stations in each terminal, while ATL and IAH have both landside and airside APM systems.)

I trust the LAX does not want such notoriety, but I fear that these could be factors in future customer satisfaction evaluations of LAX.

Beautiful Dreamer -- If there ever was a term to describe LAWA's hopes for the LAMP, these two words apply. If LAWA engineers think that passengers arriving at or departing from LAX will prefer being dropped off at a remote location and enduring long walks to being dropped off or picked up at terminal curbsides, this really applies.

As I learned in a 40-plus years career as an Aerospace Mechanical Engineer, one must never "Make Vast Plans with Half Vast Ideas."

Another slogan we had was "We never have the time or the money to do the job right in the first place, but plenty to do the job over."

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September 25, 2017

VIA E-MAIL (EQuintanilla@lawa.org, AESPIRITU@lawa.org) AND EXPRESS U.S. MAIL AND ONLINE SUBMISSION

Los Angeles World Airports
Land Use and Entitlement Section
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Chief of Airport Planning I
P.O. Box 92216
Los Angeles, California 90009-2216

Los Angeles World Airports
Attention: Evelyn Quintanilla
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Los Angeles, CA 90045

Re: Draft Environmental Assessment for Los Angeles International Airport Landside Access Modernization Program

Dear Ms. Quintanilla:

We represent TPS Parking Management, LLC, d.b.a. The Parking Spot ("TPS"), the owner and operator of extensive remote parking and transportation services and a major aggregator of travelers to Los Angeles International Airport ("LAX"). TPS understands the need for and supports the concept of Los Angeles World Airports' ("LAWA") Landside Access Modernization Plan ("LAMP" or the "Project"), and applauds LAWA's efforts to improve the efficiency of access to the Central Terminal Area (the "CTA").

However, the Draft Environmental Assessment ("EA") for the Project fails in several key areas to evaluate and disclose several key significant environmental impacts that, if properly analyzed, would make it clear that the Project requires a full Environmental Impact Study ("EIS"), and not merely an EA and a Finding of No Significant Impact ("FONSI").

The EA analyzes the Project on a piecemeal basis, while virtually ignoring the parallel California CEQA analysis that resulted in an EIR which, unlike the EA, concluded that the Project entailed **significant impacts requiring mitigation** on a number of fronts. The NEPA EA analysis, on the other hand, seeks to limit its scope to a narrow policy discussion, while ignoring the Project's larger context, and significant environmental and physical impacts.

This is unacceptable and contrary to law. It is evident that the incomplete and flawed EA misleads the public into believing that the environmental impacts are much less significant than they actually are. Indeed, because the NEPA analysis comes months after the CEQA EIR certification, the public will understand this new environmental analysis to represent a revision to the original conclusions of the EIR, potentially concluding that there are no significant impacts from the LAMP Project at all. Especially because LAWA is the same entity in charge of preparation of both the EIR and the EA (jointly with the FAA). This type of confusion is precisely why the Code of Federal Regulations ("CFR") mandates the cooperation of federal and state entities tasked with analyzing the environmental impacts of any project, and the preparation of joint documents.

As stated in TPS' prior comment letters during the CEQA process, and as detailed in the pending litigation that TPS has filed challenging the adequacy of the EIR for the LAMP Project (both attached hereto and incorporated herein), the EIR is already lacking and flawed in many ways, and must be rectified in order to come into compliance with California CEQA requirements. The failure of the EA even to acknowledge the significant environmental effects in the EIR (notwithstanding its flaws) only exacerbates the misleading and inadequate documentation prepared to date. LAWA must also fully analyze the LAMP Project's impacts in an EIS, and should use this as an opportunity to concurrently correct its legally inadequate EIR through a joint EIR/EIS, as required by the CFR.

1. LAWA Was Required to Coordinate the NEPA and CEQA Process, and Failure to Do So Highlights the Insufficiency and Piecemeal Nature of the NEPA Analysis

The NEPA regulations contained in the CFR mandate cooperation between state and local agencies in an effort to reduce duplication in the NEPA process. Strong language in the CFR requires that agencies "**shall cooperate**...**to the fullest extent possible**." (40 CFR § 1506.2(b) [emphasis added].) Federal agencies are directed to cooperate in fulfilling the requirements of state and local laws and ordinances where those requirements are in addition to, but not in conflict with, federal requirements, by preparing one document that complies with all applicable laws (40 CFR § 1506.2(c)). 40 CFR § 1506.2 provides, in relevant part:

> (b) **Agencies shall cooperate with State and local agencies to the fullest extent possible to reduce duplication between NEPA and State and local requirements, unless the agencies are specifically barred from doing so by some other law**. Except for cases covered by paragraph (a) of this section, such cooperation shall to the fullest extent possible include:

> **(1) Joint planning processes.**
>
> **(2) Joint environmental research and studies.**
>
> (3) Joint public hearings (except where otherwise provided by statute).
>
> **(4) Joint environmental assessments.**
>
> (c) **Agencies shall cooperate with State and local agencies to the fullest extent possible to reduce duplication between NEPA and comparable State and local requirements, unless the agencies are specifically barred from doing so by some other law.** Except for cases covered by paragraph (a) of this section, **such cooperation shall to the fullest extent possible include joint environmental impact statements.** In such cases one or more Federal agencies and one or more State or local agencies shall be joint lead agencies. **Where State laws or local ordinances have environmental impact statement requirements in addition to but not in conflict with those in NEPA, Federal agencies shall cooperate in fulfilling these requirements** as well as those of Federal laws so that one document will comply with all applicable laws.
>
> (d) To better integrate environmental impact statements into State or local planning processes, **statements shall discuss any inconsistency of a proposed action with any approved State or local plan and laws** (whether or not federally sanctioned). **Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law**. [emphasis added]

There can be no doubt that LAWA has skirted the required process pursuant to 40 CFR § 1506.2, by not coordinating the process of the EIR with an EIS, in virtually every respect. The repeated use of the word "shall" emphasizes the mandatory nature of the cooperation and coordination. It is unclear what the rationale was for the utter lack of coordination, as the EA does not even have a section discussing the EIR. Where is the explanation in the EA for why the environmental analysis was not done jointly as required by the code? Where is the discussion of the inconsistency between the EA's finding of no significant impacts and the EIR's finding of significant impacts that

require mitigation? Where is the discussion of the EIR's analysis when presenting the context of the Project, and when arriving at the conclusions in the EA?

By failing to address these issues, the EA unlawfully piecemeals the Project's environmental analysis, to avoid the more stringent and nuanced analysis that is required. (40 CFR § 1508.27(b)(7) ["Significance cannot be avoided by...breaking [an action] down into small component parts].) Typically, joint environmental impact statements are prepared so that the public will be able to see the varying state and federally triggered environmental impacts and mitigation measures, and a discussion of how the Project will handle each. The joint document would normally explain why one agency has identified a significant impact, while another has not. This explanation would describe the different definitions of significance and different standards for determining significance. The public has been deprived of this analysis through the improper segmenting of the environmental analysis.

Furthermore, like NEPA, CEQA encourages cooperation with Federal agencies to reduce duplication in the CEQA process. In fact, CEQA recommends that lead agencies rely on a Federal EIS "whenever possible," so long as the EIS satisfies the requirements of CEQA. (California Public Resources Code § 21083.7.)

In cases where agency experience and judgment indicate the potential for significant impacts, the agency may choose to prepare an EIS without first preparing an EA. Indeed, if a project will clearly have one or more significant impacts, agencies often immediately proceed to preparing an EIS/EIR without first preparing an EA in the NEPA context (40 CFR § 1501.3(a) ["An assessment is not necessary if the agency has decided to prepare an environmental impact statement"]), or without the Initial Study in the CEQA context (14 CCR § 15063(a)). The reality of this case is that an EIS should have been prepared jointly with the EIR, because it is clear that there are significant effects on the environment, as such effects already have been acknowledged. By electing to prepare an EA after the fact, and not timely coordinating an EIS with the state CEQA process, LAWA has inevitably delayed its own LAMP Project. What makes this even worse is the fact that LAWA was and is intimately involved in both the preparation of the EIR and the EA (*See, e.g.*, EA Cover Page, stating that the EA was prepared for both LAWA and the FAA), and that these two documents arrive at opposite conclusions with no attempt to reconcile or explain them.

By pursuing the segmented NEPA process months after the CEQA analysis was complete, LAWA has violated both the federal and state regulations relating to the required environmental analysis. As such, the Project requires an EIS, which should be jointly coordinated with the CEQA process, and should also rectify the myriad legal shortcomings of the EIR through a joint EIS/EIR.

2. Even If Analyzed Independently, There Are Major Federal Actions Significantly Affecting the Quality of the Human Environment, Which Triggers the Requirement for an EIS

An EA is prepared to determine whether the project would cause any significant effects. 40 CFR § 1508.9 provides, in relevant part:

> Environmental Assessment:
>
> (a) Means a concise public document for which a Federal agency is responsible that serves to:
>
> (1) **Briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement** or a finding of no significant impact.
>
> (2) Aid an agency's compliance with the Act when no environmental impact statement is necessary.
>
> (3) **Facilitate preparation of a statement when one is necessary**.

As discussed throughout this section, it is inconceivable that, within the context of a certified EIR and Statement of Overriding Considerations for the Project, the FAA should determine that an EIS is not necessary, and instead, prepare a FONSI. Rather, the purpose of the EA in this case would go toward facilitating the preparation of an EIS (pursuant to 40 CFR § 1508.9(a)(3)), as it is evidently necessary here.

An EIS is required for "major Federal actions" that "could significantly affect the quality of the human environment" (40 CFR § 1502.4; § 1508.18). The size, gravity, and scope of the LAMP Project is one which the City of Los Angeles has seldom seen, and there can be no doubt that it will significantly affect the quality of the human environment. Any argument to the contrary is belied by the EIR for this very Project, finding significant Project-related impacts and the need for mitigation in multiple categories.

The NEPA regulations define significance in terms of context and intensity. Context refers to the need to consider impacts within the setting in which they occur (40 CFR § 1508.27(a)). Intensity refers to the severity of the impact, with 10 non-exclusive criteria to consider specified in the regulations (40 CFR § 1508.27(b)). If an agency determines that an action will have one or more significant impacts on the environment, it must prepare an EIS (42 USC § 4332(c)). 40 CFR § 1508.27 provides, in relevant part:

(a) **Context**. This means that the significance of an action must be analyzed in several **contexts** such as **society** as a whole (human, national), the affected **region**, the **affected interests**, and the **locality**. Significance varies with the setting of the proposed action. For instance, in the case of a site-specific action, significance would usually depend upon the effects in the locale rather than in the world as a whole. Both **short- and long-term effects** are relevant.

(b) **Intensity**. This refers to the severity of impact. Responsible officials must bear in mind that more than one agency may make decisions about partial aspects of a major action. The following should be considered in evaluating intensity:

(1) **Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.**

...

(3) **Unique characteristics of the geographic area such as proximity to historic or cultural resources**, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.

...

(7) **Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.**

(8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or **historical resources**. [emphasis added]

Each of these elements, any one of which would be sufficient to trigger an EIS on its own, are analyzed in turn below.

(a) Context: the EIR for this Very Project Acknowledged Multiple Significant Environmental Impacts

Contextually, it is difficult to imagine a project with more significance than the LAMP Project – by virtually any measure. The traffic impacts are substantial. The construction impacts are momentous, and unlike anything the region has ever seen. The impacts are geographically far-reaching in that LAX is the key international airport serving all of Southern California. The Project will have a multitude of both short-term and long-term effects, and these effects cover the entire spectrum of environmental issue areas. The number of affected interests are practically infinite.

Most important, however, is the context that the EA almost entirely ignores: the fact that there was an EIR certified for this very Project that identified a multitude of significant impacts that had to be addressed through appropriate mitigation. Notably, even after the implementation of the proposed mitigation, the EIR identifies at least 8 (eight) different areas of significant and unavoidable impacts. (FEIR pp. 1-19 to 1-20.) The fact that the EA looks at many of these exact same areas and arrives at a different conclusion – without any explanation as to how or why – is baffling.

When an EA and FONSI are prepared, the lead agency must determine there are no significant impacts or that any significant impacts can be mitigated so that they are no longer significant. This finding simply is not possible in the context of this Project, given the polar opposite finding in the EIR.

Under NEPA, "all relevant, reasonable mitigation measures that could improve the project are to be identified," even those outside the agency's jurisdiction. An agency is not limited to considering mitigation only for significant impacts, but should identify feasible measures for any adverse environmental impacts, even those that are not considered significant (40 CFR § 1502.16(h)). Importantly, while CEQA mitigation requirements apply only to adverse environmental impacts found to be significant, NEPA's regulations apply to any adverse impacts, even if not significant. Thus, it is hard to understand how the NEPA EA analysis would actually go into less detail in terms of mitigation than the CEQA EIR analysis – let alone without reference to the EIR or any explanation or discussion in the EA regarding how or why those different conclusions were reached.

Such an omission necessarily produced a wholly inadequate NEPA analysis. An EIS must be prepared to thoroughly analyze and discuss these outstanding contextual issues.

(b) The LAMP Project Entails Significant Impacts, Regardless that Some of Them May Be Beneficial in Nature

NEPA requires a discussion of both direct and indirect impacts of the proposed project (40 CFR § 1502.16(a)-(b)). The regulations define "effects" as "direct effects, which are caused by the action and occur at the same time and place" (40 CFR § 1508.8(a)). Indirect effects consider effects "later in time or farther removed in distance, but are still reasonably foreseeable" (40 CFR § 1508.8(b)). "Indirect effects may include growth inducing effects and other effects related to induced changes in the pattern of land use, population density or growth rate, and related effects on air and water and other natural systems, including ecosystems" (40 CFR § 1508.8). Effects include "ecological (such as the effects on natural resources and on the components, structures, and functioning of affected ecosystems), aesthetic, historic, cultural, economic, social, or health, whether direct, indirect, or cumulative." Effects may be **both beneficial and detrimental** (40 CFR § 1508.8). Indeed, a "**significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.**" (40 CFR § 1508.27.)

The entire purpose of the LAMP Project is to improve the traffic and travel experience for travelers, and to reduce congestion of roadways in and around LAX. In concluding that there are no significant effects, the EA ignored the fact that under federal law, significant effects need not be adverse, but can be beneficial, as well. In either case, an agency must disclose those effects. Although the solutions proposed to improve the travel experience are inadequate and insufficiently disclosed (discussed in more detail in Section 3), we would not be here today if the LAMP Project did not purport to provide a significant beneficial effect on the LAX environment in the form of traffic and congestion management measures.

Because the proposed action may significantly impact the environment, the agency must prepare a Notice of Intent to begin the EIS process, or it must otherwise decide not to proceed with the proposed action.

(c) Cumulative Impacts

NEPA defines a cumulative impact as an "impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other actions" (40 CFR § 1508.7). Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

The failure to fully and properly analyze the cumulative impacts of the LAMP Project was one of the key issues addressed in our comments to the EIR, and in the pending

complaint (discussed in Section 3 below). As summarized in the attachments, the EIR does not properly analyze the cumulative impacts of this Project, and the EA fails to clear even the low bar established by the EIR. Indeed, NEPA emphasizes that "**[s]ignificance cannot be avoided by ...breaking it down into small component parts.**" (40 CFR § 1508.27(b)(7) [emphasis added].) As discussed in Section 1 above, this is exactly what the EA has done, by failing to coordinate with CEQA, and failing to even acknowledge, discuss, and contrast the significant impacts disclosed, in however flawed a manner, in LAWA's EIR.

(d) Unique Characteristics and Historic Resources

Historic and Architectural resources are the only areas in the EA where a significant adverse impact is expressly acknowledged. However, the EA claims that with "implementation of mitigation measures, significant impacts to the Theme Building as a result of the construction of the APM guideway and pedestrian walkway, would be reduced to less than significant." (EA p. 5-65.) There are other unique characteristics of this Project, however, that the EA does not acknowledge, such as the size of the Project, the scope of the Project, the far-reaching effects of the Project, and other issues addressed above. An EIS is therefore necessary to analyze those effects, pursuant to 40 CFR § 1508.27(b)(3) and (b)(8).

3. Substantively, the EA is Lacking in Many Areas, and the Project Requires a Full Analysis as Part of an EIS

As mentioned above, TPS has previously submitted comment letters during the EIR evaluation process (see Exhibit 1), and has subsequently filed a writ of mandate in Los Angeles Superior Court addressing the legal deficiencies of the EIR (see Exhibit 2). Those comments and arguments are incorporated in full herein by reference, as they apply with equal or greater force to the shortcomings of the EA. The list below will serve to summarize the substantive inadequacies, addressed in greater detail in the comment letter (Exhibit 1) and petition for writ of mandate (Exhibit 2):

- Fails to Provide an Adequate Project Description With Respect to "Future Related Development"
- Fails to Fully Describe and Evaluate Growth Inducing Impacts Caused by the LAMP Project
- Fails to Fully Describe and Evaluate Cumulative Impacts Caused by the LAMP Project

- Fails to Provide an Adequate Project Description With Respect to Traffic Plans for Shuttles, Taxis, and Rideshare Applications
- Fails to Evaluate the Potentially Affected Unsignalized Intersections
- The Stated Purpose and Objective of the Project is Contradicted and Obviated by its Significant Traffic Impacts
- The Proposed Mitigation Measures Lack Performance Standards and Enforceability
- Ignores Significant Air Quality Impacts
- Fails to Evaluate and Disclose Construction-Related Impacts

Of particular note is the fact that the EA provides a list of objectives, most of which focus on traffic efficiency improvements, particularly in relation to access to and operations within the CTA, as well as other parking facilities and rental cars, and congestion relief. (EA pp. ES-2-ES-3.) However, the proposed operations of trip aggregators, such as shuttles, run contrary to these goals. The Project perpetuates and prioritizes low-ridership vehicle access to the CTA, while counter-intuitively limiting higher efficiency and higher ridership aggregators like shuttles, and relegates those to the ITFs. (*See, e.g.*, EA p. 3-23 ["ITF West would also provide curb areas for private vehicles, parking shuttles, hotel shuttles, charter vans, and public transit buses."].)

Although the Project description is extremely vague as to which shuttles will be going where, the EA appears to state the Project would result in the discontinuation of shuttle access to the CTA, relegating them to the ITFs. (*See id.*) The EIR erroneously used limited (and flawed) assumptions in its traffic studies, and concluded that it will reduce traffic flow by 48%, but then illegally deferred discussion of how LAWA would achieve this goal, preventing any meaningful evaluation by the public or decision makers. The EA is even more vague and ambiguous than the EIR was as to how the purported goals and objectives of the LAMP Project are to be achieved. Which cars will go where? How are the ITF's supposed to be designed to accommodate the appropriate vehicles if we don't even know which types of vehicles (buses, shuttles, limos, taxis, private vehicles, transportation network companies, etc.) will be dropping off at which locations, and the projected flows of each? And, perhaps more importantly, are the assumptions of the EA consistent with those of the EIR?

The crux of the LAMP Project is being left for decisions to be made at a later time. That is unacceptable. If the Project is meant to design a solution to the traffic problems at

LAX, the analysis upon which those solutions are based must be thorough, must be specific, and must be robust. The EA fails on all fronts.

An EIS must be prepared here, and the EIS must thoroughly analyze and present concrete proposals for which types of vehicles will be delegated to which locations (ITF West, ITF East, or CTA). Without this, the public is being deprived of a real Project analysis. The EA offers nothing more than a good theory that is completely lacking in any tangible evidence to back up its goals.

We therefore urge LAWA and the FAA to conduct a proper NEPA analysis as the law requires. The EIS should be prepared jointly with a revised EIR to rectify the problems that TPS has identified herein, and in Exhibits 1 and 2, and to bring it into compliance with the relevant provisions of NEPA discussed above.

Sincerely,

BENJAMIN M. REZNIK of
Jeffer Mangels Butler & Mitchell LLP

EXHIBIT 1

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June 6, 2017

VIA E-MAIL

Hon. Herb Wesson, President
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Re: Council File 17-0276-S1
LAWA LAMP Final EIR
Comments on Final EIR
Agenda Item 10
Hearing Date: June 7, 2017

Honorable President Wesson and Councilmembers:

We represent TPS Parking Management, d.b.a. The Parking Spot ("TPS"), the owner and operator of extensive remote parking and transportation services and a major aggregator of travelers to Los Angeles International Airport ("LAX"). TPS understands the need for and supports the concept of the Landside Access Modernization Plan ("LAMP" or the "Project"), and applauds LAWA's efforts to improve the efficiency of access to the Central Terminal Area (the "CTA"). However, as noted in prior letters submitted on November 15, 2016 (identified in the Final EIR as comment letter LAMP-PC00029) and March 1, 2017 and supported by expert analysis, the Draft and Final EIRs for the Project fail in several key aspects to evaluate and disclose operational impacts to trip aggregators such as TPS, which provide substantial efficiencies within the CTA. Further, the Final EIR fails to disclose traffic impacts for broader areas around certain proposed Intermodal Transportation Facilities ("ITF"), as also described in detail by other commenters, notably the cities of El Segundo and Culver City; fails to substantiate the highly aggressive mode-share assumptions and reductions; and impermissibly defers mitigation with no enforceable performance standards. These and other deficiencies deprive the public and decisionmakers of information that is critical to evaluating both the success of the Project and its potential effects. At a minimum, LAWA and the City must revise the Final EIR to evaluate and disclose these and other potential effects. If that analysis reveals new or substantially more severe impacts, LAWA and the City must recirculate the EIR for further public review and comment.

1. The EIR Fails to Provide an Adequate Project Description, Preventing Analysis and Disclosure of Growth-Inducing and Cumulative Impacts.

The Final EIR fails to adequately respond to concerns related to an insufficient project description and, as a result, both cumulative and growth inducing impacts.

(a) Future Related Development.

The proposed LAMP includes changes to land use and zoning, and creates new parcels that will be used for construction staging, but will be available for future development after construction. (Final EIR 8-74) These include parcels near CONRAC, ITF East, APM MSF and ITF West (Draft EIR Figure 2-51). The Draft EIR identifies a potential 900,000 s.f. of development on this property, and includes a wide range of potential uses (from theaters to health clubs). The Draft and Final EIRs fail to fully evaluate the potential impacts caused by the future development on these parcels. Several comments were provided to the Draft EIR identifying this issue (Final EIR pp. 8-2, 8-4, 8-8, 8-27).

In response, LAWA provides that the proposed LAMP project is evaluated in a Project EIR, while the LAMP Potential Future Related Development is evaluated separately in a Program EIR, which requires less specificity for unknown future development. The programmatic level of detail "allows a lead agency to 'consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts." (Final EIR 8-74) The Final EIR identifies land use designations and design guidelines, even though there is only a concept plan without affirmative uses. Then, despite providing these assumptions in the EIR itself, LAWA proposes that the future development would be further evaluated under CEQA at a later date (Final EIR 8-74).

However, whether an agency prepares a Project EIR or Program EIR under CEQA, the requirement for an adequate EIR remains the same (CEQA Guidelines, §15160). The Program EIR does not decrease the level of detail required by itself, and must provide extensive detailed evaluation of the plan's effect on the environment. *See Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency*, 82 Cal.App.4th 511 (2000). Also, "[a]n ***accurate***, stable, and finite project description is the *sine qua non* of an informative and legally sufficient EIR." *County of Inyo v. City of Los Angeles*, 71 Cal.App.3d 185, 193 (1977) (emphasis supplied). Here, however, the Project Description falls far short, resulting in the failure of several analyses to adequately evaluate and disclose the Project's significant effects. Specifically, the Draft and Final EIRs fail to fully describe and evaluate the future related development by considering the highest and best use of the various parcels. The Draft and Final EIRs includes proposed mitigation measures that are merely vague and general policies. These policies do not provide any

specific guidance or restrictions for development on the property. Therefore, the Project Description in the EIR is insufficient for full evaluation under CEQA.

Where the EIR actually provides additional information on traffic impacts, that information substantiates TPS's and others' claims of significant traffic impacts from related projects. According to response to comment LAMP-PC00028-7, which requested additional analyses of intersections at and near TPS's Century Boulevard lot, the traffic volumes identified for Option 3, which is the preferred option, conflict with the traffic volumes included in the Draft EIR. If the analysis in Appendix W is accurate (and the Final EIR does not substantively dispute its accuracy), then the EIR should reference these volumes, and TPS's original comment assertion stands: based on Appendix W, Exhibit W-11, the traffic volumes increase by 600% not due solely to the Project, but due to the Project and expected growth that would otherwise not be on this roadway without the Project's anticipated connections to the west.

(b) Growth-Inducing Impacts.

The Draft and Final EIRs fail to fully evaluate growth inducing impacts caused by the LAMP project in the area and along the Green Line. Primarily, while expanding access to LAX through new transportation means, the future expansion and capacity of the airport significantly increases, by up to 16 million travelers according to certain comments (Final EIR, p. 8-1). In response, LAWA claims that there is no evidence that airlines consider surface traffic congestion in their business decisions regarding scheduling and capacity (*Id.*), and that reduced traffic congestion will not directly or indirectly affect LAX passenger growth (Draft EIR, Section 6.3.2). LAWA concludes that because LAMP is not growth-inducing, such impacts need not be evaluated (Final EIR, p. 8-7). However, basic economic analysis included in the Draft EIR shows that passengers are more likely to utilize an airport that is more easily accessible when there are multiple airports in the area, such as Burbank, Long Beach and John Wayne Airports (Draft EIR, p. 6-7, citing report of the Transportation Research Board of National Academies). Thus passengers and airplane traffic from these airports can be relocated to LAX. Then, contrarily, the Draft and Final EIR also claim that LAX can handle additional growth through efficiencies and larger planes, while at the same time failing to analyze the noise and air quality impacts associated with more and larger aircraft, as well as corresponding increases in other associated activities, such as traffic (Final EIR, p. 8-4). The Draft and Final EIRs fail to analyze this significant and clear growth potential.

(c) Cumulative Impacts.

The Draft and Final EIRs also fail to fully evaluate cumulative impacts in each of the document's sub categories, and in related projects. For instance, the LAMP relies on

completion of the Airport Metro Connector ("AMC") 96th Street Station Project and the Metro Crenshaw/LAX Transit Corridor in its analysis, but acknowledges that these have not been finalized. The Final EIR does not consider the LAMP Project in the event that the Metro Line is not approved and completed. The Final EIR also notes that the Metro Crenshaw/LAX Transit Corridor Project and AMC 96th Street Station Project were identified as part of the cumulative analysis in the Draft EIR (p. 3-10), which concluded that it could result in cumulative impacts on the environment. However, the Draft and Final EIRs failed to fully evaluate these impacts. Coordinating information with Metro is not sufficient for a full analysis (Final EIR 7-1 to -11). The Final EIR for the 96th Street Station was certified on December 1, 2016; therefore, this information is available and should be fully considered in the LAMP Final EIR.

2. The Final EIR Includes Future Unspecified Programs and Projects for Mitigation.

The LAMP EIR lacked and deferred proposing adequate mitigation measures to address the potential environmental impacts, and instead provides vague policy statements that fail to mitigate impacts. Deferring mitigation without clear performance standards is contrary to CEQA. For impacts where mitigation is known to be feasible, but where practical considerations prohibit devising such measures early in the planning process, an agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval. *See Sacramento Old City Assn. v. City Council*, 229 Cal.App.3d 1011 (1991); refer to Final EIR, p. 8-37). However, for deferral of mitigation and analysis to properly occur, the EIR must describe the nature of the actions anticipated for incorporation into the mitigation plan and provide performance standards. *See, e.g., Communities for a Better Environment v. City of Richmond*, 184 Cal. App. 4th 70, 95 (2010). In addition, and as with any discussion of mitigation, vague and speculative mitigation measures are inadequate where they lack an enforcement mechanism. *See Anderson First Coalition v. City of Anderson*, 130 Cal.App.4th 1173 (2005) .

Here, the EIR fails. In the LAMP Draft EIR, several mitigation measures lack performance standards and lack enforceability. For example, the Draft EIR requires establishing a task force to develop a comprehensive and long term communication and construction impact outreach strategy for implementation during the construction of the Project, but does not provide any specific standards or scope of outreach (MM-ST (LAMP)-1). Other vague and unenforceable provisions include the requirement that LAWA "will promote" the use of electric lawn mowers and leaf blowers, as they become commercially available, as an air quality mitigation measure (MM-AQ-3); as well as requiring that all diesel fueled equipment for construction be outfitted with the "best available emission control devices, where technologically feasible . . ." (MM-LAX-AQ-1). These and multiple other mitigation measures provide policy suggestions that do not

provide evidence that an impact will be mitigated to a less than significant level. The mitigation measures must include enforceable language and measurable standards.

Even if deferral of mitigation was appropriate in this instance (it is not), the Draft and Final EIRs failed to explain why deferral is appropriate. This failure alone constitutes an abuse of discretion. *San Joaquin Raptor Rescue Center v. County of Merced*, 1749 Cal. App. 4th 645, 670 (2005). Therefore, the City must revise the analysis to provide information adequate to inform decisionmakers and the public regarding the potential effects of the Project. The City must also recirculate the EIR to allow public comment on the new information that concerns this key impact analysis.

3. The Proposed Program is Contrary to the Central Objectives of the Project.

The Draft EIR provides six objectives, most of which focus on efficiency improvements, particularly in relation to access to and operations within the CTA, as well as other parking facilities and rental cars, and congestion relief. See Draft EIR pp. 1-7 to 1-8. However, the proposed operations of trip aggregators, such as shuttles, run contrary to these goals.

(a) The Project Perpetuates and Prioritizes Low-Ridership Vehicle Access to the CTA.

As TPS set forth in its prior comment letter, the Final EIR appears to state the Project would result in the discontinuation of shuttle access to the CTA. Rather, such shuttles would access the ITFs. However, the Project also appears to contemplate the continuation of CTA access by single-rider private and commercial vehicles, including taxis and rideshare apps. The result of this arrangement is the provision of favored access to less efficient, low-ridership transportation modes, coupled with the marginalization of higher-efficiency, higher-ridership trip aggregators such as TPS. The inevitable effect of this arrangement is a reduction in efficiency of surface operations within the CTA, and an increase in vehicle trips per passenger over time.

To the extent the ridership numbers provided in Appendix O (Table 17) to the Draft EIR provide the basis for this design decision, those numbers are flawed and conflict with TPS data and experience. Specifically, shuttle ridership during peak periods is typically much higher than what the Draft EIR simply assumes. These flawed assumptions fail to support the calculus described in the Draft and Final EIR that no essential difference exists between passenger cars and aggregators with respect to efficiency, and that the greater space occupied by the shuttles therefore represents a space efficiency problem that must be addressed in a vacuum.

Moreover, the apparent assignment of TPS shuttles (among others) to ITF West, without any apparent regard for the distance to a specific parking facility compared to ITF East, further decreases efficiency, in conflict with the central purposes of the Project. ITF West appears as the only access option for, as an example, TPS's Century Boulevard lot, which is actually substantially closer to ITF East. Decisions like these, unsupported with adequate explanation or analysis, increase vehicle miles traveled and thwart even the theoretical efficiency gains assumed by the Final EIR for the ITFs.

(b) The Project will not Decrease Traffic to the CTA or in the Vicinity of the CTA.

The Draft EIR concludes the Project will not avoid significant traffic impacts, and will thereby fail to satisfy its objective of "improving the efficiency and operation of the surface transportation system," as referenced above. Even a cursory inspection of the overall circulation and infrastructure plan reveals the primary strategy of finding more ways to shoehorn traffic from regional freeways onto already-congested local roadways, including Century Boulevard and Arbor Vitae Street.

These effects are further exacerbated by the effects associated with routing or encouraging substantial volumes of additional traffic on already-congested surface corridors such as Sepulveda Boulevard and Jefferson Boulevard. A secondary—though unacknowledged—effect, similar to the effects of re-routing shuttles, is decreasing traffic efficiency for the major bus routes that travel those corridors and that otherwise provide more efficient passenger movement than small, single- or double-occupancy vehicles of the kind the Project favors.

These effects will only be exacerbated by the substantial "future related development," which the Final EIR does not account for in its traffic (or its air quality) analysis. Even to the extent the Final EIR attempts to downplay this development as consisting at least in part of parking facilities, the fact remains that traffic to LAX will first attempt to enter the CTA or parking facilities. Thus, such facilities have the potential not only to re-route traffic, but to generate it, as well. The Draft EIR acknowledges this (see p. 6-7), stating directly that surface access represents a primary factor in driver choices, but does not adjust the analysis accordingly.

4. The Final EIR Failed Fully to Evaluate Other Traffic Effects to Which TPS Alerted the City.

Despite substantive comments by TPS regarding the potential area and types of effects the Draft EIR failed to consider, the Final EIR either failed to respond to comments in a substantive manner or failed to substantiate its conclusions. By itself, the failure

adequately to respond to comments is a fatal flaw. *C.f.*, *The Flanders Foundation v. City of Carmel-by-the-Sea, et al.*, 202 Cal.App.4th 603 (2012).

(a) The Final EIR Fails Adequately to Account for Parking Shuttle Routes and Associated Impacts.

As described in TPS's prior correspondence, while the Draft EIR identified existing shuttle routes, neither the Draft nor Final EIR provided proposed shuttle routes—those routes are merely implied, leaving the public and decision-makers to guess as to the effects of those routs on local traffic patterns. This is exacerbated by the proposed changes to and extension of 98th Street, which Appendix W to the Draft EIR identifies as carrying substantially more traffic with the Project than under existing conditions. As the primary routes from TPS and others' lots rely upon or are effected by 98th Street, and access by shuttles to the CTA appears limited in favor of the ITFs, the omission of proposed shuttle routes necessarily impedes any attempt to understand the effects at multiple intersections of 96th and 98th Streets, particularly with projected six-fold increases in vehicle trips. Moreover, to the extent the intersections remain significantly impacted even after mitigation, the Final EIR does not attempt to identify other potentially feasible mitigation measures before concluding that none are available.

(b) The Final EIR Fails to Substantiate its Refusal to Evaluate the Potentially Affected Unsignalized Intersections to Which TPS Alerted the City.

In response to TPS's request for evaluation of additional intersections in the heart of the study area, where impacts are most likely, the Final EIR simply punts. Merely stating that the Project follows the City of Los Angeles Traffic Study Policies and Procedures ("Traffic Study Policies") provides no substantial basis for ignoring potentially affected intersections, least of all when those policies specifically provide for the requested review. Although the Traffic Study Policies certainly prioritize analysis of signalized intersections, they do not dictate or even encourage that the City ignore unsignalized intersections. Rather, the policies state, "***[w]hen choosing which unsignalized intersections will be reviewed***, intersections that are adjacent to the project or that are expected to be integral to the project's site access and circulation plan should be identified" (emphasis supplied).

The City's approach also runs afoul of established law. The courts have stated agencies cannot apply screening criteria in a way that forecloses consideration of evidence of potentially significant impacts. In *Communities for a Better Environment v. California Resources Agency*, ("*CBE*") 103 Cal. App. 4th 98 (2002), the court found that the proposed guidelines of the California Resource Agency ("CRA") had employed a "... regulatory standard in a way that forecloses the consideration of any other substantial

evidence showing there may be a significant effect," and invalided the analysis on that basis. Here, TPS's and others' comments establish the potential for significant effects at certain unsignalized intersections, and the Final EIR fails to respond with any substantive analysis of the same, attempting instead to hide behind screening criteria that do not even mandate what the response to comments claims. Thus, the Final EIR deprives the public and decision-makers of information necessary to a reasoned consideration of the Project's environmental effects, and therefore fails as an informational document.

(c) The Final EIR Provides Additional Analysis that is Inconsistent with the Analysis in the Draft EIR, and Which Suggests Additional Significant Impacts May Occur.

To the extent the Final EIR purports to provide some additional analysis of unsignalized intersections, that analysis is incomplete and inconsistent. Table 1 in the Response to LAMP-PC00028-6 shows, at first blush, the additional intersections evaluated along 98th Street appear to operate at an acceptable level of service. However, the Final EIR did not provide the supporting calculation worksheets for review. Furthermore, the new analysis presented in the Final EIR fails to disclose both the baseline and the "without project" conditions for these intersections. The Traffic Study Policies (and CEQA) require disclosure of existing conditions—here, the levels of service. Further, the policies require LOS calculations to determine whether a signal is warranted. Here, however, the response in the Final EIR skips this step, apparently in the mistaken belief that because a signal is now proposed at some of these locations, no requirement now exists to disclose information fundamental to any CEQA analysis. Not so: this failure deprived the public and decisionmakers from determining the incremental impact attributable to the Project, as well as the need for and effectiveness of mitigation.

(d) The Final EIR Fails to Evaluate Traffic Safety Impacts.

The increase in traffic also could create collateral safety impacts, which the Final EIR failed to evaluate. The increase in and likely concentration of shuttles on and around 98th Street would result in long queues and inadequate vehicle gaps from TPS's and others' parking locations. As most of the vehicles seeking to exit these facilities are small passenger cars using remote lots, the potential for conflict with much larger and heavier shuttle vehicles represents a substantial safety risk that the EIR does not address, as it fails to address queuing along these roadways. Lastly, the traffic study does not account for reductions in intersection capacity created by this queueing, which can further reduce levels of service under with-Project conditions.

The Final EIR's response to comment LAMP-PC00028-8 is actually unresponsive to this concern, as LOS alone may indicate some potential for queueing but is not designed

to and cannot indicate whether a queue will actually occur and the length of that queue. As with unsignalized intersections, Traffic Study Policies provide for specific analyses to address this issue, stating that microsimulation may be necessary to fully understand queue lengths, traffic signal timing parameters, transit travel times, and other factors. For instance, and as described in TPS's prior correspondence, existing queues at a traffic signal would prevent an account of the full demand for the use of that intersection, skewing LOS values lower and understating the impacts of the Project.

5. The Final EIR Fails Fully to Evaluate and Disclose Construction-Related Traffic Impacts.

The EIR also fails to account for construction-related impacts to traffic, further understating effects and depriving the public and decisionmakers of the information necessary to make a reasoned choice regarding the Project. The projected construction period for the Project is 18 years, and yet the EIR fails to evaluate staging areas, fails to evaluate all of the roadway intersections construction could potentially affect, and fails to evaluate the broad effects of construction activities on traffic patterns in the area. Of particular note is the much smaller study area for construction effects than for operational effects: 29 intersections for construction, versus 183 intersections for operation.

6. The City Must Revise and Recirculate the EIR.

An EIR's very purpose is "to demonstrate to an apprehensive public that the agency has, in fact analyzed and considered the ecological implications of its action [approving a project]." *No Oil, Inc. v. City of Los Angeles*, 13 Cal. 3d 68, 86 (1974). Here, however, the omission of key project components and analyses has the opposite effect, demonstrating the EIR's failure as an informational document and representing a continuation of the substandard environmental review process noted in TPS's and others' earlier correspondence. To adequately evaluate and fully disclose the operational and construction-related traffic impacts of the proposed Project, and to fully clarify the Project Description, the Applicant must revise and recirculate the EIR. If the Lead Agency adds "significant new information" to an EIR prior to certification of the Final EIR, CEQA requires recirculation of a revised EIR for additional commentary. (Pub. Resources Code § 21092.1; CEQA Guidelines § 15088.5; *Laurel Heights Improvement Association v. Regents of the University of California* (1993) 6 Cal.4th 1112). CEQA requires that the Lead Agency publish a new notice of availability, and consult with all responsible agencies, including any other state, federal and local agencies which have jurisdiction by law over the project or which exercise authority over resources with may be affect by the project. (CEQA Guidelines § 15086(a)) An EIR contains "significant new information" if it is "changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project

or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project's proponents have declined to implement." Id. at 1129-30. Sections 15088.5(a)(1–2) of the CEQA Guidelines provide that information showing a new significant environmental effect of a project, or a substantial increase in its severity, triggers recirculation. The City must revise and recirculate the EIR for several reasons.

As stated above, the EIR failed to provide an accurate Project Description, failed to disclose fundamental conflicts between the Project and its objectives, relied on vague and impermissibly deferred mitigation, and failed to disclose the traffic and land use impacts associated with a wholesale change to the local and regional traffic systems serving LAX. As a result, the EIR failed to disclose significant impacts or, at the very least, a substantial increase in the severity of an impact it identified. Given the failure fully to disclose impacts, that EIR also necessarily failed to provide a truly reasonable range of mitigation measures or alternatives to reduce or avoid those impacts. The City must therefore recirculate the EIR to provide the public and decision makers an opportunity to review and comment on these impacts, consistent with CEQA Guidelines § 15088.5(a)(1), before any informed and legally valid decision is possible.

Sincerely,

BENJAMIN M. REZNIK of
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EXHIBIT 2

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

BS170107

TPS PARKING MANAGEMENT, LLC, d.b.a. THE PARKING SPOT, a limited liability corporation;
TPS PARKING CENTURY, LLC, a limited liability corporation;

Petitioners,

v.

CITY OF LOS ANGELES, a municipal corporation;
LOS ANGELES WORLD AIRPORTS, a department of the City of Los Angeles; and DOES 1-25, inclusive,

Respondents.

CASE NO.

VERIFIED PETITION FOR WRIT OF MANDATE

[CEQA Matter Under California Pub. Resources Code §§ 21000, et seq., California Civil Proc. Code §1094.5]

Dept 1

I.

INTRODUCTION

1. The Petitioners in this case understand the need for and support the concept of the Landside Access Modernization Plan ("LAMP" and/or "Project") and the need to improve the efficiency of access to the Central Terminal Area at LAX.

2. However, the California Environmental Quality Act ("CEQA") demands more than just a good concept. The Environmental Impact Report ("EIR") in this case is riddled with legal error, and there are ample reasons why a writ must issue to require the Respondents to fulfill their obligations under CEQA and subject the proposed Project to adequate environmental review.

3. The LAMP Project risks putting the City, and its effected residents and visitors, in a situation where a well-intentioned vision is poorly executed, and counterintuitively and ironically thwarts the objectives that it was designed to achieve, such as relieving traffic.

4. The LAMP EIR fails to address many important issues, by either impermissibly choosing to punt the issue to another day (effects of future development, traffic routes), or by failing to acknowledge that a problem exists in the first place (increase in passenger growth at LAX, analysis of important intersections), even where it has been brought to the attention of the decision-makers from multiple sources.

5. The Project description fails to meet even the most basic foundational requirements of CEQA. California courts have recognized that an "accurate, stable, and finite project description is the *sine qua non* of an informative and legally sufficient EIR." *San Joaquin Raptor Rescue Center v. County of Merced*, 149 Cal. App. 4th 645, 655 (2007). The EIR contains an incomplete, confusing and unstable Project description that is by definition insufficient, and the City's reliance on the EIR to support the approvals of the Project entitlements is not supported by substantial evidence.

6. Among other things, the EIR omitted consideration of important Project elements (e.g., traffic studies of certain intersections, and operational impacts to trip aggregators such as shuttles), failed to support what analysis was completed with quantitative data (e.g., failure to substantiate calculations relating to intersections and baseline data), and all but ignored the

considerable effects the Project will have on several crucial areas (e.g., the disclosure of traffic impacts for broader areas around certain proposed transportation hubs).

7. In addition, despite the dictate of CEQA that a lead agency must address comments raising significant environmental issues in a good faith, and provide a reasoned response, the City simply ignored or deferred on numerous comments raising issues with the EIR's inadequacy, including comments concerning the significant impacts the Project will create to various traffic and transportation-related issues – the very issues that the LAMP Project was designed to alleviate.

8. The EIR also impermissibly defers mitigation with no enforceable performance standards, all while ignoring the cumulative effects of large Project elements.

9. As such, the EIR fails to adequately address, disclose, evaluate, and potentially mitigate various environmental impacts, and the City approved the Project of Los Angeles World Airport ("LAWA") pursuant to an EIR that is materially deficient and lacking essential measures that are meant to ensure environmental scrutiny. These and other deficiencies deprive the public (and, of course, the original decision- makers) of information that is critical to evaluating both the success of the Project and its potential environmental effects.

10. Petitioners seek a writ to set aside the approval of the LAMP Project, and require Respondents to revise the EIR to evaluate and disclose these and other potential environmental effects. To the extent that the analysis reveals new or substantially more severe impacts, Respondents must recirculate the EIR for further public review and comment, and must mitigate those impacts. This will allow the City to consider the Project in accordance with its established policies and follow the dictates of CEQA, which are designed to ensure that government actors are making informed environmental decisions based upon the community's and other stakeholders' input.

II.

THE PARTIES

11. Petitioner TPS Parking Management, LLC, d.b.a. The Parking Spot, is a Delaware limited liability company that owns and operates extensive remote parking and transportation services to airports throughout the country, and is a major aggregator of travelers to LAX. TPS

does extensive business in Los Angeles County, and specifically, in and around LAX.

12. Petitioner TPS Parking Century, LLC, is a Delaware limited liability company that owns and operates remote parking and transportation services specifically servicing LAX.

13. Petitioners TPS Parking Management, LLC, and TPS Parking Century, LLC, are referred to collectively herein as "Petitioners" and/or "TPS."

14. Respondent City of Los Angeles (the "City") is a municipal corporation and a charter city, organized and existing under the laws of the State of California, with the capacity to sue and be sued. As used herein, the term "City" includes, but is not limited to, City employees, agents, officers, boards, councils, commissions, departments, and their members, all equally charged with complying with duties under the City Charter, and with the laws of the State of California.

15. Petitioners are informed and believe, and on that basis allege, that Respondent Los Angeles World Airports ("LAWA") is the lead agency for the Project, and is a department of the City that owns and operates LAX and the Van Nuys airports. LAWA is governed by a seven-member Board of Airport Commissioners ("BOAC"). As used herein, the term "LAWA" includes, but is not limited to, employees, agents, officers, boards, councils, commissions, departments, and their members, all equally charged with complying with duties under the City Charter, and with the laws of the State of California.

16. The City and LAWA are referred to collectively herein as "Respondents."

17. Petitioners do not know the true names or capacities, whether individual, corporate, associate or otherwise, of Respondent Does 1 through 25, inclusive, and therefore sue said Respondents under fictitious names. Petitioners will amend this Petition to show their true names and capacities when and if the same have been ascertained.

III.

JURISDICTION, VENUE AND EXHAUSTION OF ADMINISTRATIVE REMEDIES

18. This Court has jurisdiction under Public Resources Code § 21168 and California Code of Civil Procedure § 1094.5.

19. Venue is proper in this Court, because the causes of action alleged in this Petition arose in Los Angeles County, and all parties are located or do business in Los Angeles County. In

addition, the Project site is located in Los Angeles County.

20. Petitioners complied with the requirements of Public Resources Code § 21167.5 by serving on Respondent City written notice of Petitioners' intention to commence this action on June 29, 2017. Copies of the written notice and proof of service of the notice are attached hereto as Exhibit A.

21. Petitioners will comply with California Code of Civil Procedure § 388 by furnishing a copy of this pleading to the Attorney General of the State of California within 10 days after filing.

22. Petitioners have performed all conditions precedent to filing the instant action, and have exhausted any and all available administrative remedies to the extent required by law.

23. Petitioners have no plain, speedy or adequate remedies in the ordinary course of the law unless this Court grants the requested writ of mandate and requires Respondent City to set aside its approval of the Project.

IV.

FACTS COMMON TO ALL CAUSES OF ACTION

A. The Proposed Project

24. Petitioners are informed and believe, and on that basis allege, that LAWA is revamping the ground transportation system at LAX through a multi-billion dollar Project called the Landside Access Modernization Program.

25. Petitioners are informed and believe, and on that basis allege, that LAMP is designed to accomplish the following main objectives:

(1) reduce traffic congestion within the Central Terminal Area ("CTA") and surrounding streets at LAX;

(2) enhance passenger experience;

(3) expedite the rental car process;

(4) promote sustainability; and

(5) ensure best use of surplus property.

26. Petitioners are informed and believe, and on that basis allege, that the Project consists of the following central components:

(1) Automated People Mover ("AMP") system with six stations transporting passengers to and from the CTA: The APM will be an aboveground system that will transport passengers between the CTA and other areas of the Project site located east of the CTA, including transportation to the new consolidated car rental facility and to new public parking facilities proposed between Sepulveda Blvd. and the 405. The system will have six stations (three inside the CTA and three outside the CTA), including a station at the multi-modal/transit facility at 96th St./Aviation Blvd. for passengers to access the Metro regional rail system (this component of the project will be designed and planned by Metro). The APM system will be approximately 2.25 miles long and will run 24 hours a day.

(2) Consolidated Rental Car Facility ("CONRAC") for rental car agencies serving LAX: The CONRAC will consolidate car rental agencies into one centralized location. The CONRAC will have access to the CTA via the APM system.

(3) Intermodal Transportation Facilities ("ITF"): Two new public parking facilities with multiple passenger pick up and drop off locations via two new transit hubs outside of the CTA. The ITFs will also contain meet and greet areas, passenger processing facilities, retail, parking, and access to the APM system. They will be constructed for pick up and drop off for airport passengers and commercial shuttles.

27. Petitioners are informed and believe, and on that basis allege, that in addition to those central components, other major works contemplated in the Project include: (1) roadway improvements throughout the Project area; (2) passenger walkways; (3) installation of security and fire safety features and utility infrastructure; (4) identification of options for pricing, policies, and procedures regarding vehicle operations at LAX; (4) incorporation of LAX Design Guidelines into the proposed Project; (5) acquisition of land; (6) subdivision of land; (7) preparation of new tract maps; (8) dedication and vacation of public rights-of-way; (9) obtaining zoning change approvals; (10) demolition of certain existing facilities; (11) preparation of enabling projects to allow construction of the proposed Project; and (12) amendments to land use plans, including the City's General Plan, the LAX Plan, and the LAX Specific Plan.

28. Petitioners are informed and believe, and on that basis allege, that the Project will

consist of 2 phases: (1) construction from 2017-2024 of the AMP, ITFs, and CONRAC; (2) roadway improvements done from 2025-2030.

29. Petitioners are informed and believe, and on that basis allege, that LAMP is comprised of three general areas amounting to approximately 860 acres of land generally bounded by Tom Bradley International Terminal on the west, 105 on the south, 405 on the east, and Westchester Parkway/West Arbor Vitae St. on the north.

30. The three areas more specifically consist of: (1) the CTA, which includes World Way, the LAX terminals, and areas west of Sepulveda; (2) east of the CTA bounded by W. Century Blvd. on the south, 405 on the east, the LAX boundary on the north (i.e. W. Arbor Vitae St.); and (3) the Aviation Blvd./Imperial Highway area bound by the Imperial Highway on the south, W. 111th St. on the north, Hindry Ave. on the east, and Aviation Blvd. to the west.

31. Petitioners are informed and believe, and on that basis allege, that the following land use plans and elements are implicated: (1) LAX Plan; (2) LAX Specific Plan; (3) LAX Community Plan; (4) Westchester-Playa del Rey Community Plan; (5) City of LA General Plan Land Use Element; (6) Transportation Element; and (7) Mobility Plan 2035 Amendment.

B. Environmental Review and Approval of the Project

32. LAWA was the lead agency that prepared an EIR for the Project.

33. On February 5, 2015, the Notice of Preparation and Initial Study were released.

34. The Initial Study concluded that Project-related impacts to agricultural and forestry, biological, archaeological and paleontological, geology and soils, and mineral resources and recreation would be less than significant.

35. However, the Initial Study also found that the Project entailed potentially significant impacts to aesthetics, air quality, cultural (historic), greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population, housing, public services, transportation/traffic, utilities and service systems, and mandatory findings of significance, thus requiring analysis in an EIR.

36. Throughout 2015, Respondents conducted various public scoping meetings and public workshops relating to LAMP and its components.

37. On September 15, 2016, Respondents released the Draft EIR, which analyzed the environmental resources identified in the Notice of Preparation and Initial Study as having potentially significant impacts.

38. Certain mitigation measures were proposed in the Draft EIR as follows: (1) Transportation Demand Management Program to provide transit alternatives to the 30% of employees who live within 5 miles of the airport; (2) implementation of the Construction Traffic Project Task Force to coordinate street closures, detours, and road work; (3) implementation of special design features to mitigate visual impacts to the Theme Building; (4) incorporation of solar energy into LAMP facilities; and (5) implementation of Intelligent Transportation System on major corridors, including signal synchronization, changeable message signs, and CCTV cameras.

39. Some of the Project components, including the APM, ITFs, and CONRAC were already considered in the LAX Master Plan, LAX Master Plan Environmental Impact Statement/Environmental Impact Report and the Specific Plan Amendment Study and corresponding EIR. Thus, the LAMP EIR is a Project-level EIR that was prepared to assess the environmental impacts of constructing and operating the proposed components of LAMP.

40. In addition, future related development within the LAX Landside Support Subarea was analyzed only at a programmatic level in the EIR and consequently, additional CEQA environmental review will need to be conducted in the future relating to those future developments.

41. The Draft EIR public comment period ended on November 15, 2016. Seventy-five comment letters were received on the Draft EIR, including from TPS.

42. On February 17, 2017, Respondents released the Final EIR. On March 2, 2017, Respondents certified the EIR and approved the Project at a public hearing.

43. On June 7, 2017, Respondents filed a Notice of Determination indicating that: 1) the Project will have a significant effect on the environment; 2) an EIR was prepared pursuant to CEQA; 3) mitigation measures were made a condition of approval; 4) a mitigation monitoring plan was adopted; 5) a statement of Overriding Considerations was adopted; and 6) findings were made pursuant to CEQA provisions.

44. The EIR suffers from numerous defects, including failure to provide substantial

evidence to substantiate its conclusions. This timely writ petition followed.

C. The EIR Fails to Provide an Adequate Project Description With Respect to "Future Related Development"

45. The EIR's Project description is lacking and insufficient as it relates to future related development, growth-inducing impacts, and cumulative impacts.

46. Instead of addressing the issues in a transparent fashion, LAWA simply punts on major issues, preventing a proper analysis of the real project impacts.

47. The proposed LAMP includes changes to land use and zoning, and creates new parcels that will be used for construction staging, but will be available for future development after construction. These include parcels near CONRAC, ITF East, APM Maintenance and Storage Facility, and ITF West (Draft EIR Figure 2-51).

48. The Draft EIR identifies a potential 900,000 square feet of "commercial development" on these staging properties, and includes a wide range of potential future uses, including office space, commercial space, conference centers, hotels, health and fitness centers, theaters, galleries, museums, and other community uses.

49. In this case, the future related development is to take place on 47.3 acres of the total of 2 million square feet to be originally used for construction staging. Despite the scope of the area involved, neither the uses envisioned for this area, nor their impacts, are described or analyzed with any specificity.

50. It is unclear how the EIR arrived at the conclusion that only 900,000 square feet of the 2 million square feet will be used for future development. The assumption that less than half of the total available acreage will be used is unsupported by substantial evidence.

51. The description of this "future related development" is so amorphous in its development prospects that it is impossible to adequately analyze it at a project level of detail. In response, LAWA provides that the proposed LAMP Project is evaluated in a Project EIR, while the LAMP Potential Future Related Development is evaluated separately in a Program EIR, which requires less specificity for unknown future development. This approach is referred to in the CEQA Guidelines as "tiering."

52. The programmatic level of detail allows a lead agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems or cumulative impacts. The EIR identifies land use designations and design guidelines, even though there is only a concept plan without affirmative uses. Then, despite providing these assumptions in the EIR itself, LAWA proposes that the future development would be further evaluated under CEQA at a later date.

53. However, the fact that specific development options have not yet been specified does not preclude the duty of the EIR to include specific environmental review of potential uses.

54. Pursuant to the CEQA Guidelines, "[a]gencies are encouraged to tier the environmental analyses which they prepare for separate but related projects including general plans, zoning changes, and development projects. This approach can eliminate repetitive discussions of the same issues and focus the later EIR or negative declaration on the actual issues ripe for decision at each level of environmental review. Tiering is appropriate when the sequence of analysis is from an EIR prepared for a general plan, policy, or program to an EIR or negative declaration for another plan, policy, or program of lesser scope, or to a site-specific EIR or negative declaration. **Tiering does not excuse the lead agency from adequately analyzing reasonably foreseeable significant environmental effects of the project and does not justify deferring such analysis to a later tier EIR or negative declaration.**" (CEQA Guidelines § 15152(b) [emphasis supplied].)

55. Here, the EIR fails to fully evaluate the potential impacts caused by the future development on these parcels. Several comments were provided to the EIR identifying this issue, but were not adequately addressed.

56. Whether an agency prepares a Project EIR or Program EIR under CEQA, the requirement for an adequate EIR remains the same. (CEQA Guidelines, §15160.) The Program EIR does not decrease the level of detail required by itself, and must provide extensive detailed evaluation of the plan's effect on the environment. *See Friends of Mammoth v. Town of Mammoth Lakes Redevelopment Agency*, 82 Cal.App.4th 511 (2000). Also, "[a]n accurate, stable, and finite project description is the *sine qua non* of an informative and legally sufficient EIR." *County of Inyo v. City of Los Angeles*, 71 Cal.App.3d 185, 193 (1977). Furthermore, "An accurate Project

Description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." *Silveira v. Las Gallinas Valley Sanitary Dist.*, 54 Cal. App. 4th 980, 990 (1997). Here, however, the Project Description falls far short, resulting in the failure of several analyses to adequately evaluate and disclose the Project's significant effects.

57. Specifically, the EIR fails to fully describe and evaluate the future related development by considering the highest and best use of the various parcels. The EIR includes proposed mitigation measures that are merely vague and general policies. These policies do not provide any specific guidance or restrictions for development on the property. Therefore, the Project Description in the EIR is insufficient for full evaluation under CEQA.

58. Where the EIR actually provides additional information on traffic impacts, that information substantiates Petitioners' and others' claims of significant traffic impacts from related projects. According to response to comment LAMP-PC00028-7, which requested additional analyses of intersections at and near TPS's Century Boulevard lot, the traffic volumes identified for Option 3, which is the preferred option, conflict with the traffic volumes included in the Draft EIR.

59. If the analysis in Appendix W of Appendix O (hereinafter, Appendix W) is accurate (and the EIR does not dispute its accuracy), then the EIR should reference these volumes, and TPS's original comment assertion stands: based on Appendix W, Exhibit W-11, the traffic volumes increase by 600%, not due solely to the Project, but due to the Project and expected growth that would otherwise not be on this roadway without the Project's anticipated connections to the west.

60. The CEQA Guidelines require that the air quality and traffic impacts of the future related development should be conducted by referring to and relying on the zoning designations for those locations. That the EIR simply dismisses those impacts (by saying that they will be analyzed at a future date when that aspect of the Project is analyzed under a Program EIR) is fatal.

61. The EIR understates the full impacts of the Project, and thus, renders the EIR inadequate, and unsupported by substantial evidence.

D. The EIR Fails to Fully Describe and Evaluate Growth Inducing Impacts Caused by the LAMP Project

62. While expanding access to LAX through new transportation means, the future expansion and capacity of the airport significantly increases, by millions of travelers, according to certain comments.

63. In response, LAWA claims that there is no evidence that airlines consider surface traffic congestion in their business decisions regarding scheduling and capacity, and that reduced traffic congestion will not directly or indirectly affect LAX passenger growth (EIR, Section 6.3.2). LAWA concludes that because LAMP is not growth-inducing, such impacts need not be evaluated.

64. However, basic economic analysis included in the EIR shows that passengers are more likely to utilize an airport that is more easily accessible when there are multiple airports in the area, such as Burbank, Long Beach and John Wayne Airports. (EIR, p. 6-7, citing report of the Transportation Research Board of National Academies).

65. Thus passengers and airplane traffic from these airports can be relocated to LAX. Then, contrarily, the EIR also claims that LAX can handle additional growth through efficiencies and larger planes, while at the same time failing to analyze the noise and air quality impacts associated with more and larger aircraft, as well as corresponding increases in other associated activities, such as traffic. The EIR fails to analyze this significant and clear growth potential.

66. Academic research provides that ground access conditions do have a significant impact on passenger operations. (LAMP-AL-00008.) Those increases necessitate disclosure and analysis. The responses to the comments on this issue illustrate LAWA's state of denial on this matter, despite being on record having previously stated that ground access is an existing constraint on passenger capacity at LAX and that capacity could not grow without network upgrades. (2004 Master Plan EIR at 1-4.)

67. There is no substantial evidence supporting LAWA's decision not to disclose and analyze the environmental impacts relating to the growth-inducing impacts from increased ground capacity at LAX. Rather, the only substantial evidence in the record leads to the opposite conclusion, and demonstrates that the Project would lead to more passengers and aircraft operations

at LAX, thereby resulting in greater environmental impacts.

68. The EIR must consider, discuss, and analyze these impacts – not dismiss them summarily.

E. The EIR Fails to Fully Describe and Evaluate Cumulative Impacts Caused by the LAMP Project

69. The EIR also fails to fully evaluate cumulative impacts in each of the document's sub categories, and in related projects. (CEQA Guidelines §15065(a)(3) ["The project's incremental effects viewed in connection with the effects of past projects, the effect of other current projects and the effect of probable future projects"].)

70. For instance, the LAMP relies on completion of the Airport Metro Connector ("AMC") 96th Street Station Project and the Metro Crenshaw/LAX Transit Corridor in its analysis, but acknowledges that these have not been finalized.

71. The EIR does not consider the LAMP Project in the event that the Metro Line is not approved and completed. The EIR also notes that the Metro Crenshaw/LAX Transit Corridor Project and AMC 96th Street Station Project were identified as part of the cumulative analysis in the EIR (p. 3-10, table 3-1), which concluded that it could result in cumulative impacts on the environment.

72. However, the EIR failed to fully evaluate these impacts. Coordinating information with Metro is not sufficient for a full analysis. The EIR for the 96th Street Station was certified on December 1, 2016; therefore, this information is available and should have been considered in the LAMP EIR.

73. LAWA was not excused from evaluating the cumulative impacts of the Metro stations, and therefore, the approval of the EIR was based on incomplete facts and analysis.

74. Also, the EIR does not address the cumulative impacts caused by additional gates that are being added within LAX, as well as an additional passenger terminal facility south of Century Blvd. known as Terminal 9, which would add 12 new gates during the Project's lifetime.

75. Regarding the additional gates, LAWA's explanation that the total number of gates does not exceed the 153 cap in the current LAX Plan is completely irrelevant. It is incumbent upon

this EIR to analyze all of the cumulative impacts as they relate to this Project. If there are additional gates being added to LAX, they must be analyzed as a cumulative impact, regardless of whether or not the total number is still within the current LAX Plan cap. In other words, the question of whether the cap is exceeded goes to whether or not the LAX Plan would have to be modified to accommodate the additional gates, not whether the cumulative impacts of the additional gates must be addressed (clearly they do).

76. As to the "Terminal 9" matter, it is not even mentioned (let alone evaluated) in the EIR. This is a fundamental flaw that relates most closely to the cumulative impacts analysis requirement. However, it also highlights other flaws in the CEQA analysis, such as failure to adequately respond to comments, and incomplete and inadequate Project description.

77. As set forth in the CEQA Guidelines, a legally adequate cumulative impact analysis follows a two-step process: (1) identify whether a cumulative impact has occurred or will occur; and (2) determine whether the Project would result in a cumulatively considerable contribution to that impact. (CEQA Guidelines §§ 15064(h)(1), 15065(a)(3), 15355(b); *Communities for a Better Environment v. California Resources Agency* ("*CBE*"), 103 Cal. App. 4th 98, 120 (2002).)

78. The EIR fails to adequately analyze cumulative impacts, in part because it fails to provide a specific Project description on which to base cumulative impacts.

79. Due to these deficiencies in the EIR, the City approval of the Project is not based on substantial evidence.

F. The EIR Fails to Provide an Adequate Project Description With Respect to Traffic Plans for Shuttles, Taxis, and Rideshare Applications

80. The EIR provides a list of objectives, most of which focus on efficiency improvements, particularly in relation to access to and operations within the CTA, as well as other parking facilities and rental cars, and congestion relief. (EIR pp. 1-7 to 1-8.) However, the proposed operations of trip aggregators, such as shuttles, run contrary to these goals.

81. The Project perpetuates and prioritizes low-ridership vehicle access to the CTA, while counter-intuitively limiting higher efficiency and higher ridership aggregators like shuttles, and relegates those to the ITFs.

82. Although the Project description is vague, the EIR appears to state the Project would result in the discontinuation of shuttle access to the CTA. Rather, such shuttles would access the ITFs. However, the Project also appears to contemplate the continuation of CTA access by single-rider private and commercial vehicles, including taxis and rideshare apps such as Uber and Lyft.

83. The result of this arrangement is the provision of favored access to less efficient, low-ridership transportation modes, coupled with the marginalization of higher-efficiency, higher-ridership trip aggregators such as TPS and hotel shuttles. The inevitable effect of this arrangement is a reduction in efficiency of surface operations within the CTA, and an increase in vehicle trips per passenger over time.

84. To the extent the ridership numbers provided in Appendix O (Table 17) to the Draft EIR provide the basis for this design decision, those numbers are flawed and conflict with TPS data and experience. Specifically, shuttle ridership during peak periods is typically much higher than what the EIR simply assumes. These flawed assumptions fail to support the calculus described in the EIR that no essential difference exists between passenger cars and aggregators with respect to efficiency, and that the greater space occupied by the shuttles therefore represents a space efficiency problem that must be addressed in a vacuum.

85. The apparent assignment of TPS shuttles (along with others such as hotel shuttles) to ITF West, without any apparent regard for the distance to a specific parking facility compared to ITF East, further decreases efficiency, in conflict with the central purposes of the Project.

86. ITF West appears as the only access option for, as an example, TPS's Century Boulevard lot, which is actually substantially closer to ITF East. Decisions like these, unsupported with adequate explanation or analysis, increase vehicle miles traveled and thwart even the theoretical efficiency gains assumed by the EIR for the ITFs.

87. The problem is exacerbated by the proposed changes to and extension of 98th Street, which Appendix W to the EIR identifies as carrying substantially more traffic with the Project than under existing conditions. As the primary routes from TPS and others' lots rely upon or are effected by 98th Street, and access by shuttles to the CTA appears to be eliminated, and instead, pushed to the ITFs. The omission of proposed shuttle routes necessarily impedes any attempt to

understand the effects at multiple intersections of 96th and 98th Streets, particularly with projected six-fold increases in vehicle trips.

88. Moreover, to the extent the intersections remain significantly impacted even after mitigation, the EIR does not attempt to identify other potentially feasible mitigation measures before concluding that none are available.

89. In response to several comments relating to shuttle operations, the EIR states: "Both off-Airport parking shuttles and hotel shuttles were assumed to operate at the ITF West in the Draft EIR traffic impact analyses, with approximately 48 percent of the traffic assumed to be shifted outside of the CTA. LAWA will be evaluating appropriate actions and incentives to take to effect this shift in traffic to ensure that the investment they are making in improving the landside access system at LAX is successful. LAWA recognizes that there are a number of ways that a shift in approximately 48% of vehicle traffic can be achieved; LAWA will continue to coordinate with the affected parties and will need to seek approval from the Board of Airport Commissioners to implement any changes to the existing transportation policies at LAX." (*See, e.g.*, FEIR 2-269, LAMP-PC00028-2.)

90. The assumptions made by Respondents in connection with the traffic analysis are flawed and lack sufficient specificity. Essentially, the response in the comments say: "We're going to reduce the vehicles to 48% of current levels, but we still haven't figured out how."

91. This level of uncertainty does not meet the requirements of a Project description required by the CEQA regulations: "[a]n accurate, stable, and finite project description is the *sine qua non* of an informative and legally sufficient EIR." *County of Inyo v. City of Los Angeles*, 71 Cal.App.3d 185, 193 (1977). There is nothing accurate, stable, or finite about coming up with a number, and trying to figure out a way to make it work later.

92. Rather, the EIR should have assessed all of the alternatives, routes, and possibilities relating to drop off of passengers at the CTA and the ITFs, and come up with a concrete plan relating to its execution, in order to arrive at a realistic 48% goal.

93. Logic dictates that this would essentially necessitate the restriction of lower-capacity vehicles (taxis, rideshare apps such as Uber and Lyft, and private vehicles) to a much larger degree

than shuttles and other high-capacity aggregators.

94. While the Draft EIR identified existing shuttle routes, neither the Draft nor Final EIR provided proposed shuttle routes—those routes are merely implied, leaving the public and decision-makers to guess as to the effects of those routes on local traffic patterns.

95. An EIR must describe a reasonable range of alternatives to the project that could feasibly attain most of the basic objectives of the project while avoiding or substantially lessening any of the significant effects of the project. (CEQA Guidelines § 15126.6.) As the EIR fails to provide a sufficient Project description to evaluate the significant effects, the alternatives are per se inadequate, because the EIR cannot ascertain an alternative that would reduce impacts to the actual Project, and an environmentally preferable alternative cannot be determined.

96. The description, planning, and analysis of the numbers and types of vehicles that are being delegated to the CTA, ITF West, and ITF East is the crux of the LAMP Project, in that such decisions will dictate whether the Project successfully achieves its objectives. It is inconceivable that such an important element of the Project is left to "coordinate" at a later time, and only then, seek approval from the BOAC.

97. Clearly there is no substantial evidence to support the decision of approval, based on such an amorphous Project description in connection with this issue.

G. The EIR Fails to Evaluate the Potentially Affected Unsignalized Intersections

98. In response to TPS's request for evaluation of additional intersections in the heart of the study area, where impacts are most likely, the Final EIR simply punts. Merely stating that the Project follows the City of Los Angeles Traffic Study Policies and Procedures ("Traffic Study Policies") provides no substantial basis for ignoring potentially affected intersections, least of all when those policies specifically provide for the requested review.

99. Although the Traffic Study Policies certainly prioritize analysis of signalized intersections, they do not dictate or even encourage that the City ignore unsignalized intersections. Rather, the policies state, "**[w]hen choosing which unsignalized intersections will be reviewed,** intersections that are adjacent to the project or that are expected to be integral to the project's site access and circulation plan should be identified" (emphasis supplied). These are precisely the type

of unsignalized intersections ("adjacent to the project" and "integral to the project's site access") for which TPS requested evaluation.

100. The City's approach also runs afoul of established law. The courts have stated agencies cannot apply screening criteria in a way that forecloses consideration of evidence of potentially significant impacts. In *Communities for a Better Environment v. California Resources Agency*, ("*CBE*") 103 Cal. App. 4th 98 (2002), the court found that the proposed guidelines of the California Resource Agency ("CRA") had employed a "... regulatory standard in a way that forecloses the consideration of any other substantial evidence showing there may be a significant effect," and invalided the analysis on that basis.

101. Here, TPS's and others' comments establish the potential for significant effects at certain unsignalized intersections, and the Final EIR fails to respond with any substantive analysis of the same, attempting instead to hide behind screening criteria that do not even mandate what the response to comments claims. Thus, the Final EIR deprives the public and decision-makers of information necessary to a reasoned consideration of the Project's environmental effects, and therefore fails as an informational document.

102. The Final EIR does provide additional analysis for certain intersections, but that analysis is inconsistent with the analysis in the Draft EIR, and suggests additional significant impacts may occur.

103. To the extent the Final EIR purports to provide some additional analysis of unsignalized intersections, that analysis is incomplete and inconsistent.

104. Table 1 in the Response to LAMP-PC00028-6 shows, at first blush, the additional intersections evaluated along 98th Street appear to operate at an acceptable level of service. However, the Final EIR did not provide the supporting calculation worksheets for review.

105. Furthermore, the new analysis presented in the Final EIR fails to disclose both the baseline and the "without project" conditions for these intersections. The Traffic Study Policies (and CEQA) require disclosure of existing conditions—here, the levels of service. Further, the policies require levels of service calculations to determine whether a signal is warranted.

106. Here, however, the response in the Final EIR skips this step, apparently in the

mistaken belief that because a signal is now proposed at some of these locations, no requirement exists to disclose information fundamental to any CEQA analysis. Not so: this failure deprived the public and decision-makers from determining the incremental impact attributable to the Project, as well as the need for and effectiveness of mitigation.

H. The Stated Purpose and Objective of the Project is Contradicted and Obviated by its Significant Traffic Impacts

107. One of the key stated objectives of the Project is to improve the efficiency and operation of the surface transportation system which LAX operates. (EIR Section 1.1.3(d).) However, ironically, the traffic improvements will actually cause significant traffic impacts to certain intersections in 2024, before mitigation, and in 2035, even after mitigation has taken place.

108. In addition, it is important to note that the 900,000 square feet of "future related development" (discussed in detail above) is not even taken into account in the conclusion that there will be significant traffic impacts. That future related development will create significant additional impacts with and without mitigation, during both time periods.

109. The traffic impacts are created by the following items that come directly from the LAMP Project: (1) dramatic changes to the alignment of streets and roadways; (2) new facilities for rental cars (CONRAC) and the consolidation of various modes of transportation at the ITFs; and (3) new freeway interchanges leading to local streets that are already heavily traveled.

110. In addition, the new AMC 96th Street Station Project (which is its own independent project) near CONRAC will also be a hub for parking of private cars and other modes of public transportation, and will undoubtedly lead to parallel and cumulative impacts.

111. The Project proposes a five percent Transportation Demand Management (TDM) reduction for employee related trips with no means of measuring the effectiveness of the TDM measures to see if they actually result in this reduction.

112. The Project adds a significant amount of traffic to existing arterial corridors (like Sepulveda Boulevard and Jefferson Boulevard) that provide access to LAX as alternate routes to using the 405 Freeway, and on which Culver CityBus operates four different bus service routes. These arterial roads will be significantly and irreversibly impacted. The EIR did not analyze the

Project's impacts to at least four Culver CityBus lines. Given the significant traffic being added to the streets upon which those buses operate, the EIR should have analyzed the Project's impacts to those bus lines, but did not.

113. The EIR concludes the Project will not avoid significant traffic impacts, and will thereby fail to satisfy its objective of "improving the efficiency and operation of the surface transportation system," as referenced above. Even a cursory inspection of the overall circulation and infrastructure plan reveals the primary strategy of finding more ways to shoehorn traffic from regional freeways onto already-congested local roadways, including Century Boulevard and Arbor Vitae Street.

114. This is further exacerbated by the effects associated with routing or encouraging substantial volumes of additional traffic on already-congested surface corridors such as Sepulveda Boulevard and Jefferson Boulevard.

115. A secondary—though unacknowledged—effect, similar to the effects of re-routing shuttles, is decreasing traffic efficiency for the major bus routes that travel those corridors and that otherwise provide more efficient passenger movement than small, single- or double-occupancy vehicles of the kind the Project favors.

116. These effects are exacerbated by the substantial "future related development," which the EIR does not account for in its traffic analysis.

117. The increase in traffic also could create collateral safety impacts, which the EIR failed to evaluate. The increase in and likely concentration of shuttles on and around 98th Street would result in long queues and inadequate vehicle gaps from TPS's and others' parking locations.

118. As most of the vehicles seeking to exit these facilities are small passenger cars using remote lots, the potential for conflict with much larger and heavier shuttle vehicles represents a substantial safety risk that the EIR does not address, as it fails to address queuing along these roadways.

119. Also, the traffic study does not account for reductions in intersection capacity created by this queueing, which can further reduce levels of service under with-Project conditions.

120. The Final EIR's response to comment LAMP-PC00028-8 is actually unresponsive to

this concern, as levels of service alone may indicate some potential for queueing but is not designed to and cannot indicate whether a queue will actually occur and the length of that queue. As with unsignalized intersections, Traffic Study Policies provide for specific analyses to address this issue, stating that microsimulation may be necessary to fully understand queue lengths, traffic signal timing parameters, transit travel times, and other factors.

121. For instance, and as described in TPS's correspondence, existing queues at a traffic signal would prevent an account of the full demand for the use of that intersection, skewing level of service values lower and understating the impacts of the Project.

122. The Project also should have, at a minimum, considered the cumulative impacts of the bus systems, the future related development of 900,000 square feet, and the new AMC 96th Street Station Project, as they each have a significant effect on the Project's footprint. Collectively, they have an enormous effect on the Project's footprint.

I. The EIR Proposed Mitigation Measures Lack Performance Standards and Enforceability

123. The EIR defers proposing adequate mitigation measures to address the potential environmental impacts, and instead provides vague policy statements that fail to mitigate impacts.

124. Deferring mitigation without clear performance standards is contrary to CEQA. For impacts where mitigation is known to be feasible, but where practical considerations prohibit devising such measures early in the planning process, an agency can commit itself to eventually devising measures that will satisfy specific performance criteria articulated at the time of project approval. *See Sacramento Old City Assn. v. City Council*, 229 Cal.App.3d 1011 (1991).

125. However, for deferral of mitigation and analysis to properly occur, the EIR must describe the nature of the actions anticipated for incorporation into the mitigation plan and provide performance standards. *See, e.g., Communities for a Better Environment v. City of Richmond*, 184 Cal. App. 4th 70, 95 (2010). In addition, and as with any discussion of mitigation, vague and speculative mitigation measures are inadequate where they lack an enforcement mechanism. *See Anderson First Coalition v. City of Anderson*, 130 Cal.App.4th 1173 (2005) .

126. Here, the EIR fails. Several mitigation measures lack performance standards and

lack enforceability. For example, the EIR requires establishing a task force to develop a comprehensive and long term communication and construction impact outreach strategy for implementation during the construction of the Project, but does not provide any specific standards or scope of outreach (MM-ST (LAMP)-1).

127. Other vague and unenforceable provisions include the requirement that LAWA "will promote" the use of electric lawn mowers and leaf blowers, as they become commercially available, as an air quality mitigation measure (MM-AQ-3); as well as requiring that all diesel fueled equipment for construction be outfitted with the "best available emission control devices, where technologically feasible . . ." (MM-LAX-AQ-1). These and multiple other mitigation measures provide policy suggestions that do not provide evidence that an impact will be mitigated to a less than significant level. The mitigation measures must include enforceable language and measurable standards.

128. Even if deferral of mitigation was appropriate in this instance (it is not), the EIR failed to explain why deferral is appropriate. This failure alone constitutes an abuse of discretion. *San Joaquin Raptor Rescue Center v. County of Merced*, 1749 Cal. App. 4th 645, 670 (2005).

129. Furthermore, as analyzed above, the additional effects of the 900,000 square feet of future related development have not been properly addressed. To the extent that the analysis presents significant environmental impacts, such impacts must be addressed, and most likely mitigated.

130. Therefore, the City must be required to revise the analysis to provide information adequate to inform decision-makers and the public regarding the potential effects of the Project. The City must also be required to recirculate the EIR to allow public comment on the new information that concerns this key impact analysis.

J. The EIR Ignores Significant Air Quality Impacts

131. Aside from the transportation and traffic related issues, another significant environmental impact that is perpetuated by many of these same underlying sources is to the air quality.

132. The EIR's air quality analysis fails to study the air quality impacts of the both the

airside and landside portions of the total redesign of LAX. Specifically, the EIR singles out only the landside portions of what was a complete (airside, terminal, and landside) redesign of LAX.

133. This strips the Project of its context, as the LAMP Project is an integral component of the larger Los Angeles International Airport Specific Plan Amendment Study ("SPAS EIR"), which under accepted protocols of air quality analysis, must be evaluated in total.

134. Allowing the EIR to simply ignore the airside impacts allows the larger SPAS project to game the environmental review system by staggering its project components. When the landside air quality impacts are analyzed in a vacuum, the air quality effects are "banked" and included in the baseline for the next project review. Thus, each additional project is only effecting the air quality incrementally, and the larger SPAS project evades a thorough analysis of its air quality environmental effects. This defeats the entire purpose of CEQA review, and is the entire reason behind the cumulative impacts doctrine. (CEQA Guidelines §15065(a)(3) ["The project's incremental effects viewed in connection with the effects of past projects, the effect of other current projects and the effect of probable future projects"].)

135. The Hastings Ave. particulate matter monitoring station that was primarily used results in flawed data. The Hastings Ave. station is on the north and west end of the northernmost runway at LAX. This station is not a reasonable source of background information for portions of the airport that are downwind of other airport emission sources. The wind around LAX flows from west to east, and the Hastings Ave. station will not catch emissions that are upstream. As a result, the baseline data relating to air quality is flawed, and the decision-makers arrived at their conclusions without the appropriate information.

136. The EIR does not adequately estimate the contribution of the emissions from the land used for LAMP construction staging. Air quality is the other major area (aside from traffic and transportation) where the defects in the EIR caused by the failure to analyze the impacts of the 900,000 square feet of future related development are evident.

137. The EIR also fails to analyze the joint impacts of operational and construction activities. The air quality impacts for construction will be felt simultaneously with construction between the completion of phase 1 and phase 2 (2024-2035). These combined effects are not

analyzed in the EIR.

K. The EIR Failed to Evaluate and Disclose Construction-Related Impacts

138. The EIR also fails to account for construction-related impacts to traffic, further understating effects and depriving the public and decision-makers of the information necessary to make a reasoned choice regarding the Project.

139. The projected construction period for the Project is 18 years, and yet the EIR fails to evaluate staging areas, fails to evaluate all of the roadway intersections construction could potentially affect, and fails to evaluate the broad effects of construction activities on traffic patterns in the area.

140. Of particular note is the much smaller study area for construction effects than for operational effects: 29 intersections for construction, versus 183 intersections for operation.

141. That misleads the public and decision-makers as to the true nature of the impacts of the Project, and constitutes abuse of discretion.

L. The EIR Did Not Adequately Respond to Comments

142. The Final EIR fails to provide a substantive response to numerous comments to the Draft EIR.

143. Despite substantive comments by TPS regarding the effects the Draft EIR failed to consider, the Final EIR either failed to respond to comments in a substantive manner or failed to substantiate its conclusions. By itself, the failure adequately to respond to comments is a fatal flaw. *The Flanders Foundation v. City of Carmel-by-the-Sea, et al.*, 202 Cal.App.4th 603 (2012).

144. Final EIRs are required to consider mitigation proposed in comments. CEQA § 21091(d)(2)(B) requires a Final EIR to address "significant" environmental issues, which include suggestions for mitigation and alternatives, generally from public comments on the Draft EIR. CEQA Guidelines § 15088(c) requires specific explanations ("good faith, reasoned analysis") for rejection of such measures. *LAUSD v. City of L.A.*, 58 Cal. App. 4th 1019, 1029-30 (1997) (an EIR must respond to mitigation proposals unless "facially infeasible."). The response to mitigation proposals need not be exhaustive, but must show good faith. *Id.* A failure to respond to significant issues raised (including mitigation proposals) renders an EIR legally inadequate. *City of Long*

Beach v. LAUSD, 176 Cal. App. 4th 889, 904 (2009).

145. Each and every issue raised in this petition (not to mention other issues raised by other commenters that are not the subject of this writ action) was raised as a comment during the comment phases of the Draft and Final EIRs. LAWA, rather than using the opportunity to address the issues raised, and make modifications where appropriate, did one of two things: 1) refusal to accept or acknowledge the problem, or 2) giving facial recognition to the problem, but downplaying, inadequately addressing, or deferring it.

146. The responses to comments failed adequately to respond to many of the traffic related comments, and many of the comments regarding air quality and toxic air contaminants. This constitutes abuse of discretion

FIRST CAUSE OF ACTION

(Petition for Writ of Mandate Under Public Resources Code § 21168 and California Code of Civil Procedure § 1094.5 - Violation of CEQA)

(Against All Respondents and Does 1–25)

147. Petitioners hereby incorporate by this reference the allegations of all previous paragraphs of this Petition as though fully set forth herein.

148. The numerous serious deficiencies in the environmental review process for the Project, as well as the significant or potentially significant impacts arising from the Project that were not adequately identified, analyzed or mitigated, constitute violations of the California Environmental Quality Act. Respondent City abused its discretion, did not proceed in the manner required by law, failed to make the required findings, and failed to act on the basis of substantial evidence when approving the Project and adopting the EIR.

149. The EIR is legally inadequate in numerous respects, and the City's review and approval was legally deficient in the manner described in this Petition.

150. An EIR's very purpose is "to demonstrate to an apprehensive public that the agency has, in fact analyzed and considered the ecological implications of its action [approving a project]." *No Oil, Inc. v. City of Los Angeles*, 13 Cal. 3d 68, 86 (1974). Here, however, the omission of key

Project components and analyses has the opposite effect, demonstrating the EIR's failure as an informational document and representing a continuation of the substandard environmental review process noted in TPS's and others' correspondence and other comments in the EIR.

151. To adequately evaluate and fully disclose the operational and construction-related traffic impacts of the proposed Project, and to fully clarify the Project Description, this court must set aside the EIR approval, and require the revision and recirculation of the EIR.

152. The City must revise and recirculate the EIR for several reasons. As stated above, the EIR failed to provide an accurate Project Description with respect to future related development, failed to analyze growth-inducing impacts, failed to analyze cumulative impacts, failed to provide an adequate Project description in connection with traffic plans for different types of vehicles, failed to evaluate un-signalized intersections, failed to disclose fundamental conflicts between the Project and its objectives, relied on vague and impermissibly deferred mitigation, failed to adequately respond to comments, and failed to disclose the traffic, air quality, construction, and land use impacts associated with a wholesale change to the local and regional traffic systems serving LAX.

153. Taken together, these errors and omissions resulted in the global failure of the EIR to inform the public or decision-makers of the true scope of the environmental effects of the Project.

154. The EIR failed to disclose significant impacts or, at the very least, a substantial increase in the severity of an impact it identified. Given the failure fully to disclose impacts, the EIR also necessarily failed to provide a truly reasonable range of mitigation measures or alternatives to reduce or avoid those impacts.

155. This constitutes abuse of discretion and the approval of the EIR must be set aside.

PRAYER FOR RELIEF

WHEREFORE, Petitioners pray for relief as follows:

1. For a peremptory writ of mandate directing Respondent to set aside the approval of the Project and adoption of the EIR and to hold the required public hearings after giving public notice in the manner required by law;

2. For a temporary stay, temporary restraining order, and preliminary and permanent

injunction restraining Respondents and their respective agents, servants and employees from taking any action to implement the Project pending full compliance with CEQA and other state and local laws;

3. For costs of suit in this action;

4. For reasonable attorneys' fees, including as authorized by Code of Civil Procedure section 1021.5 and other provisions of law; and

5. For such other and further relief as the Court deems just and proper.

DATED: June 29, 2017

JEFFER MANGELS BUTLER & MITCHELL LLP
BENJAMIN M. REZNIK
MATTHEW D. HINKS
SEENA M. SAMIMI

By: _____
MATTHEW D. HINKS
Attorneys for Petitioners TPS PARKING MANAGEMENT, LLC, and TPS PARKING CENTURY, LLC

JMBM | Jeffer Mangels Butler & Mitchell LLP

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing VERIFIED PETITION FOR WRIT OF MANDATE and know its contents.

I am Vice President of the Western Region of TPS Parking Management, LLC, a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

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

Executed on June 29 2017, at Aurora, Colorado.

Brian P. Vandehey
Print Name of Signatory

B. V
Signature

VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I have read the foregoing VERIFIED PETITION FOR WRIT OF MANDATE and know its contents.

I am Vice President of TPS Parking Century, LLC, a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

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

Executed on June 29, 2017, at Chicago, Illinois.

Stephen F. Douglass
Print Name of Signatory

Signature

EXHIBIT A

JEFFER MANGELS BUTLER & MITCHELL LLP
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Attorneys for Petitioners

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

TPS PARKING MANAGEMENT, LLC, d.b.a. THE PARKING SPOT, a limited liability corporation;
TPS PARKING CENTURY, LLC, a limited liability corporation;

Petitioners,

v.

CITY OF LOS ANGELES, a municipal corporation;
LOS ANGELES WORLD AIRPORTS, a department of the City of Los Angeles; and
DOES 1-25, inclusive,

Respondents.

CASE NO.

NOTICE OF INTENT TO FILE CEQA PETITION

[Public Resources Code § 21167.5]

TO RESPONDENT CITY OF LOS ANGELES:

PLEASE TAKE NOTICE under Public Resources Code § 21167.5 that Petitioners TPS Parking Management, LLC, d.b.a. The Parking Spot, a limited liability corporation, and TPS Parking Century, LLC, a limited liability corporation, intend to file a verified petition for writ of mandate ("Petition") pursuant to Code of Civil Procedure § 1094.5 and Public Resources Code Sections 21000 *et seq.* against Respondent City of Los Angeles challenging the approval of the Environmental Impact Report in connection with its approval of the Los Angeles World Airport's Landside Access Modernization Plan development project located within the City of Los Angeles, described in the City's Notice of Determination filed June 7, 2017. A copy of the Petition is attached hereto.

DATED: June 29, 2017

JEFFER MANGELS BUTLER & MITCHELL LLP
BENJAMIN M. REZNIK
MATTHEW D. HINKS
SEENA M. SAMIMI

By: _____
MATTHEW D. HINKS
Attorneys for Petitioners TPS PARKING MANAGEMENT, LLC, and TPS PARKING CENTURY, LLC

JMBM | Jeffer Mangels Butler & Mitchell LLP

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LA 33719540v1

PROOF OF SERVICE

TPS Parking Management, LLC et al. v. City of Los Angeles, et al.

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 1900 Avenue of the Stars, 7th Floor, Los Angeles, CA 90067-4308.

On June 29, 2017, I served true copies of the following document(s) described as **NOTICE OF INTENT TO FILE CEQA PETITION** as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Jeffer Mangels Butler & Mitchell LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Los Angeles, California.

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

Executed on June 29, 2017, at Los Angeles, California.

Darice Kannon

JMBM | Jeffer Mangels Butler & Mitchell LLP

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LA 33719540v1

SERVICE LIST

City of Los Angeles
200 N. Spring Street
Room 360
Los Angeles, California 90012

September 26, 2017

Evelyn Quintanilla
Chief of Airport Planning
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009

Subject: LAX Landside Access Modernization Program Draft Environmental Assessment – SUPPORT

Dear Ms. Quintanilla,

The Valley Industry and Commerce Association (VICA) strongly supports the Los Angeles International Airport (LAX) Landside Access Modernization Program (LAMP) as presented in the August 2017 Draft Environmental Assessment. The proposed action will enhance multimodal access to the airport, reduce traffic congestion, and improve air quality around the airport.

As one of the largest international airports in the United States, we must ensure that passengers and visitors have convenient, affordable, and reliable access to the airport facilities. Unfortunately, due to increasing demand, access to areas around the Central Terminal Area (CTA) have become severely congested.

In order to transform LAX into a modern airport, Los Angeles World Airports (LAWA) is committed to redeveloping ground access to the airport. These improvements will provide seamless connections to major highway and public transit systems, easing traffic and congestion for all Angelenos. Without a direct connection to Metro, a consolidated car rental facility and alternative modes of transit access to the CTA, businesses and local residents will continue to face heavy traffic congestion.

LAX is a portal for economic investments throughout California and the world – local businesses rely on LAX to provide a connection to domestic and foreign markets. The project components – including the access to the Automated People Mover (APM), Intermodal Transportation Facilities (ITFs), Consolidated Rental Car Center (CONRAC) and a direct connection to Metro – will strengthen the region's economic standing and promote business growth throughout Southern California.

LAWA has made a good-faith effort to communicate with affected stakeholders, mitigate potential negative impacts, and put forward a strong proposal to ease traffic around LAX and promote economic growth. With LAX serving as the largest international gateway on the West Coast, VICA supports the proposed Landside Access Modernization Program to improve passenger quality-of-service and provide world-class facilities for its travelers.

Sincerely,

Kevin Tamaki
VICA Chairman

Stuart Waldman
VICA President