

Los Angeles International Airport (LAX)  
Runway 6R-24L Runway Safety Area (RSA)  
Improvements Project

Final Mitigated Negative Declaration  
and Initial Study (IS/MND)

**Volume 5: Response to Comments and  
Corrections/Additions to the Draft IS/MND**

**Final Initial Study/Mitigated Negative Declaration**

This document (Volume 5) comprises the second and final part of the Initial Study/Mitigated Negative Declaration (IS/MND) for the Runway 6R-24L Runway Safety Area (RSA) Improvements Project and supplements the Draft IS/MND for the Runway 6R-24L RSA Improvements Project (consisting of Volumes 1 through 4), previously circulated for public review and comment. The Runway 6R-24L RSA Improvements Project IS/MND is available for review at Los Angeles World Airports (LAWA) Administrative Offices, One World Way, Suite 218, Los Angeles, California 90045.

City of Los Angeles  
Los Angeles World Airports

May 2015





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Runway 6R-24L Runway Safety Area (RSA)  
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City of Los Angeles  
Los Angeles World Airports

May 2015





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## Preface

The Los Angeles World Airports (LAWA) prepared and distributed the Draft Initial Study/Mitigated Negative Declaration (IS/MND) for the Los Angeles International Airport (LAX) Runway 6R-24L Runway Safety Area (RSA) Improvements Project (Project) for public review on March 19, 2015. The proposed Project was deemed necessary by the Federal Aviation Administration (FAA) in order to bring Runway 6R-24L into compliance with the requirements of the *Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act, 2006* (Public Law [P.L.] 109-115), November 30, 2005. This Act requires that not later than December 31, 2015, the owner or operator of an airport certificated under Title 14, Code of Federal Regulations (CFR), Part 139, *Certification and Operations: Land Airports Serving Certain Air Carriers*, shall improve the airport's runway safety areas to comply with FAA design standards.<sup>1</sup>

Pursuant to CEQA Guidelines Section 15073, the Draft IS/MND was circulated for a public review period from March 19, 2015 until April 24, 2015. As required by the California Office of Planning and Research, State Clearinghouse, State agencies were provided the opportunity to comment through April 17, 2015. Also, a public workshop was held during the comment period on April 14, 2015. A total of two comment letters were received during the public review period; no written comments were submitted at the public workshop on April 14, 2015. A public hearing was also held on a Draft Environmental Assessment (EA) evaluating the proposed Project in compliance with the National Environmental Policy Act (NEPA) during the April 14, 2015 public workshop. Two comments on the Draft EA were provided orally at the public hearing.

This Final IS/MND has been prepared pursuant to the California Environmental Quality Act (CEQA) Public Resources Code Section 21000 et seq, and in accordance with the Guidelines for Implementation of CEQA (14 CCR 15000 et seq.). The Final IS/MND is comprised of the Response to Comments, corrections/additions to the Draft IS/MND, the Draft IS/MND, Draft IS/MND appendices, and the Mitigation Monitoring and Reporting Program. Collectively, these documents will be used by LAWA (as the lead agency) in its review and consideration of the proposed Project. Under CEQA requirements, LAWA will adopt the Final MND if, based on the whole record, including the IS and comments received, it determines that there is no substantial evidence that the Project will have a significant effect on the environment [CEQA Guidelines, Section 15074(b)].

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<sup>1</sup> U.S. National Archives and Records Administration. Code of Federal Regulations, Title 14, Part 139, *Certification and Operations: Land Airports Serving Certain Air Carriers*, January 1, 2002.

The Final IS/MND for the proposed Project consists of two components. The first component is comprised of the Draft IS/MND and its technical appendices, as follows:

**Volume 1 – Draft IS:** Volume 1 of the Final IS/MND includes the Draft IS-Main Document, which was distributed for public review and comment from March 19, 2015 through April 24, 2015. As required by the California Office of Planning and Research, State Clearinghouse, State agencies were provided the opportunity to comment through April 17, 2015.

**Volume 2 – Draft IS Technical Appendices:** Volume 2 of the Final IS/MND includes Appendix A. Appendix A is comprised of the supporting data and analyses for the Air Quality and Greenhouse Gas analyses.

**Volume 3 – Draft IS Technical Appendices:** Volume 3 of the Final IS/MND includes Appendices B through F. These appendices contain the supporting data and analyses that were developed in conjunction with the Draft IS for Human Health, Biological Resources, Cultural Resources, California Coastal Commission coordination, and Noise, respectively.

**Volume 4 – Draft IS Technical Appendices:** Volume 4 of the Final IS/MND includes Appendices G and H. These appendices contain the supporting data and analyses that were developed in conjunction with the Draft IS for construction traffic and the traffic analysis conducted for the taxicab staging lot relocation, respectively.

The second component of the Final IS/MND includes comments and responses to the Draft IS/MND, and any corrections and additions to the Draft IS/MND, as further described below:

**Volume 5 – Responses to Comments and Corrections and Additions to the Draft IS/MND:** The final volume of the IS/MND includes comments, and responses to those comments, on the Draft IS/MND. Indices (i.e., lists) of agencies, organizations, and individuals that commented on the Draft IS, as well as copies of the comment letters in their original form (i.e., photocopies of comment letters) are included in this volume. This document also includes any revisions that were made to the Draft IS/MND based on comments received. Revisions were also made to clarify information presented in the Draft IS/MND; only minor technical changes or additions have been made. These changes and additions to the IS/MND do not raise important new issues related to significant effects on the environment.

All of the documents described above, comprising the Final IS/MND for the proposed Project, are available for public review at:

- LAWA Administration Offices, One World Way, Suite 218, Los Angeles, CA 90045
- Westchester-Loyola Villa Branch Library, 7114 West Manchester Avenue, Los Angeles, CA 90045
- Playa Vista Branch Library, 6400 Playa Vista Dr., Los Angeles, CA 90094
- Inglewood Library, 101 West Manchester Boulevard, Inglewood, CA 90301
- El Segundo Library, 111 W. Mariposa Ave., El Segundo, CA 90245

The Final IS/MND is also available online at [www.ourlax.org](http://www.ourlax.org).

# 1. Introduction and Indices

## 1.1 Introduction

In compliance with CEQA requirements, LAWA has completed this Final IS/MND for the Runway 6R-24L RSA Improvements Project at LAX. As described in the preface of this document, the Final IS/MND for the proposed Project consists of two components, with the first component consisting of Volumes 1 through 4 – Draft IS/MND and associated Technical Appendices, and the second component being Volume 5 – Responses to Comments and Corrections and Additions to the Draft IS/MND. This document, Volume 5, constitutes the second component of the Final IS/MND.

### 1.1.1 DRAFT IS/MND

A detailed description of the proposed Project is provided in Volume 1 of the IS/MND (see Chapter 1 in Volume 1 of the Draft IS-Main Document). On March 19, 2015, LAWA published the Draft IS/MND for the proposed Project. In accordance with CEQA, the Draft IS/MND was circulated for public review for a minimum of 30 days, with the review period closing on April 24, 2015. A notice of the Draft IS/MND for the proposed Project was mailed to organizations and interested stakeholders potentially affected by or interested in the proposed Project. A notice regarding the Project was published in the *Los Angeles Times*, the *Daily Breeze*, the *Argonaut News*, and *La Opinion* on March 19, 2015. The Notice of Intent and proofs of publication are included in **Appendix A**. As required by the California Office of Planning and Research, State Clearinghouse, State agencies were provided the opportunity to comment through April 17, 2015. A public workshop was held on April 14, 2015, during the comment period.

As explained in more detail in Volume 1 of the IS/MND, the primary components of the Runway 6R-24L improvements includes: (1) relocate the end of Runway 6R approximately 200 feet to the east and shifting the existing displaced threshold 420 feet to the east, providing a new displaced threshold of about 550 feet; (2) construct a blast pad 400 feet long and 280 feet wide on both runway ends; (3) construct retaining wall and add fill graded to RSA standards on the Runway 6R end; (4) remove/relocate/shift of existing taxiways and construction of new Taxiway connectors E16 and E17 at the end of Runway 6R; (5) relocate various navigational aids, including the glide slope antenna, equipment shelter, Precision Approach Path Indicators (PAPI), and ILS Localizer Antenna; (6) replacement of Medium Intensity Approach Light System with Runway Alignment Indicator Lights (MALSR) lights including removing the two westernmost stations and shifting of light stations to the east coincident with existing light station locations; (7) shift Runway 24L endpoint by constructing approximately 800 feet of new runway pavement to the east; (8) shift Taxiway E endpoint

approximately 500 feet to the east with 400-foot separation from the runway; (9) remove existing Taxiway E7 including the existing loop westbound that joins Taxiway V between Runways 24L and 24R; (10) construct new connector Taxiways E7 and E6; (11) demolish and relocate existing Secure Area Access Post (SAAP) #3 and the Air Operations Area (AOA) fence; (12) protect in place existing storm sewer and utilities; (13) relocate taxicab holding/staging area and associated buildings; (14) implement declared distances; (15) extend and realign service roads south of Taxiway E, requiring the closure of LAWA-owned Alverstone Avenue and Davidson Drive and adjacent parking lot, none of which are publicly accessible; (16) construct new and rehabilitate existing runway and taxiway pavement, as needed in the areas of the improvements identified above; and, (17) modify existing lighting and markings in newly constructed pavements. The proposed Project would not result in increased or decreased aviation activity at LAX compared to existing conditions, and would not increase usable runway length or move the runway north or south.

### 1.1.2 FINAL IS/MND

In accordance with CEQA Guidelines §15088, LAWA prepared responses to all comments received on the Draft IS. As required by the CEQA Guidelines, the focus of the responses to comments is on “the disposition of significant environmental issues raised.” Detailed responses are not provided to comments on the merits of the proposed Project or on other topics that do not relate to environmental issues.

This document, which is the second component of the Final IS/MND, presents the comments received during the public review period for the Draft IS/MND and provides written responses to those comments. A total of two comment letters were received during the public review period; no written comments were submitted at the public workshop held on April 14, 2015. A public hearing was also held on a Draft Environmental Assessment (EA) evaluating the proposed Project in compliance with the National Environmental Policy Act (NEPA) during the April 14, 2015 public workshop. Two comments on the Draft EA were provided orally at the public hearing. Although these comments were ostensibly on the Draft EA, they are included in this document for disclosure purposes. An index presented at the end of this chapter lists the agencies and individuals that submitted comments on the Draft IS/MND. Copies of all comment letters received are included in **Appendix B** of this document. Chapter 2 of this document presents, on a letter-by-letter basis, each comment which is then followed immediately by a response, for all comments received during the review period for the Draft IS/MND (March 19, 2015 through April 24, 2015). The comments and responses are organized and grouped together into categories based on the affiliation of the commenter. The comments are presented first by regional agencies, and then public comments (i.e., letters from private citizens, organizations, etc.). Chapter 3 of this document provides corrections and additions to information presented in the Draft IS/MND.

Comments received on the Draft IS/MND do not raise important new issues related to significant effects on the environment. Therefore, as noted in the Draft IS/MND, no significant effects would result from the proposed Project, and therefore a Mitigated Negative Declaration will be adopted. Mitigation measures proposed by LAWA that are designed to reduce or avoid potential environmental impacts associated with Project construction and operation are considered part of the proposed Project and are listed in **Appendix C**, Mitigation Monitoring and Reporting Program.

Pursuant to CEQA, the Final IS/MND is not circulated for another round of comments and responses. The Final IS/MND is presented to the decision-makers for their use in considering the proposed Project. Interested persons may comment on the Final IS/MND, including these responses, in the course of the decision-making process related to the Project; however, LAWA is not required to provide responses to such comments.

## 1.2 Index of Comment Letters

An alphanumeric index system is used to identify each comment and response, and is keyed to each letter and the individual comments therein. For example, the first comment letter within the group of regional agencies submitting comments on the Draft IS/MND is from the South Coast Air Quality Management District, and the text of the letter is considered to have 10 individual comments. The subject of the letter was assigned the alphanumeric label "6R-24L\_RSA-AR00001," representing "Runway 6R-24L Runway Safety Area Improvements Project-Agency-Regional-Letter No. 1." The same basic format and approach is used for the comment letters from the public ("PC").

The following are the prefix codes used for categorizing the comment letter types:

LETTER ID PREFIX	DESCRIPTION
AL	Regional Agency
PC	Public Comment

To assist the reader's review and use of the responses to comments, a comment index is provided in **Table 1**. This index provides the alphanumeric label number, commenter name, affiliation (i.e., name of agency or organization that the author represents), and date (if provided) of each comment letter.

**Table 1: Index of Comment Letters**

LETTER ID	COMMENTOR	AFFILIATION/AGENCY	DATE
6R-24L_RSA-AR00001	Wong, Jillian	South Coast Air Quality Management District	04/23/2015
6R-24L_RSA-PC00001	Keating, Edward		03/16/2015
6R-24L_RSA-PC00002	Parris, Michael		03/24/2015
6R-24L_RSA-PC00003	Parris, Michael		03/24/2015

SOURCE: Ricondo & Associates, Inc., May 2015.

PREPARED BY: Ricondo & Associates, Inc., May 2015.

Chapter 2 provides individual comments and responses, presented on a letter-by-letter basis. Each comment is typed exactly as it appears in the original comment letter. No corrections to typographical errors or other edits to the original comments were made. A copy of each original comment letter is provided in Appendix B of this document.

Immediately following each typed comment is a written response. In many instances, the response to a particular comment may refer to the response(s) to another comment(s) that expressed the same concern or is otherwise related. Cross-referencing of responses uses the alphanumeric index system as described above. For example, a response may indicate "Please see response to comment 6R-24L\_RSA-PC00001-2" if that response addresses the same concern expressed in a different comment.



## 2. Comments and Responses

Refer to Appendix B of the Final IS/MND for a copy of the comment letters received on the Runway 6R-24L RSA Improvements Project Draft IS/MND. The following provides the comments and individual responses to said comments:

6R-24L\_RSA-AR00001

Wong, Jillian

South Coast Air Quality Management District

04/23/2015

### 6R-24L\_RSA-AR00001-1

#### *Comment:*

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the Lead Agency proposes to make improvements to Runway 6R-24L at LAX. These improvements are intended to improve safety and to comply with airport design standards as promulgated by the Federal Aviation Administration (FAA). Construction is expected to begin in late 2015 and be completed by the end of 2016.

#### *Response:*

Comment noted.

### 6R-24L\_RSA-AR00001-2

#### *Comment:*

Project emissions were estimated in the Draft EA/Draft IS/MND using the FAA required Emissions and Dispersion Modeling System (EDMS) to estimate on-airport aircraft emissions. The SCAQMD staff has concerns about the project modeling analysis and permitting requirements for portable equipment during construction. The SCAQMD staff recommends that all the modeling be updated to ensure that there are no significant impacts. Further details concerning the modeling based on SCAQMD staff comments and permitting are included in the attachment.

#### *Response:*

This comment summarizes individual concerns of air quality modeling approaches as further outlined in Comment 6R-24L\_RSA-AR00001-4. SCAQMD has grouped its comments on both the federal Environmental

Assessment (EA) and the state Initial Study/Mitigated Negative Declaration into one comment that does not apply to both documents. The federal EA and the state Initial Study/Mitigated Negative Declaration were prepared separately and are not joint federal/state environmental disclosure documents. EDMS was used for the air quality analysis conducted for the federal EA prepared under the National Environmental Policy Act (NEPA), as required by FAA. AERMOD dispersion modeling was performed for air quality analyses in the Initial Study/Mitigated Negative Declaration documentation to comply CEQA and state regulations. As applicable to the IS/MND, individual comments regarding dispersion modeling are addressed in responses to Comments 6R-24L\_RSA-AR00001-4 through -9.

#### 6R-24L\_RSA-AR00001-3

*Comment:*

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final NEPA/CEQA document. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

*Response:*

LAWA provided written responses to SCAQMD for all comments contained within their letter during a meeting held on May 5, 2015.

#### 6R-24L\_RSA-AR00001-4

*Comment:*

1. In the Draft EA/Draft IS/MND, the Lead Agency determined that construction and operational impacts are less than significant. The SCAQMD staff recommends the following comments be incorporated in the air quality modeling, as applicable and that the modeling be updated in order to demonstrate that project air quality impacts are less than significant.

*Response:*

Comment noted; responses to SCAQMD staff recommendations below. The original and revised dispersion results (based on SCAQMD comments) are shown in **Tables 2** through **7**. As shown in the tables, and as discussed further below, the recommendations from the SCAQMD staff do not materially alter the results of the air quality and human health risk assessment analyses. All results remain below thresholds of significance.

#### 6R-24L\_RSA-AR00001-5

*Comment:*

- a. In the AERMOD modeling, the Lead Agency used meteorological data from LAX as on-site data. In the AERMET file, the Lead Agency used an anemometer height of 38.4 meters, while the ASOS website indicates that the anemometer height for LAX should be 33 feet. Additionally, when processing meteorological data with AERMET for AERMOD applications, EPA suggests that a threshold wind

speed of 0.5 m/s be used. SCAQMD staff therefore recommends the Lead Agency revise the AERMET analysis using the correct anemometer height and threshold wind speed.

*Response:*

The anemometer height and 0.5 m/s windspeed threshold have been corrected within the AERMET analysis. These changes have been carried through to the meteorological data files and all of the air quality dispersion analyses and human health risk assessments have been updated to reflect these changes. Results from these modifications slightly affect concentrations. In most cases concentrations slightly decreased, but for some pollutants, concentrations slightly increased; none exceed significance thresholds.

6R-24L\_RSA-AR00001-6

*Comment:*

- b. In the AERMOD modeling, the Lead Agency only included fenceline receptors along the project property boundary and did not include a receptor grid. In order to ensure that the maximum impacts from the project have been identified, SCAQMD staff recommends the Lead Agency include a receptor grid of no more than 100 meters spacing, extended out from the fenceline to a distance that demonstrates that the project's maximum impacts are accurately captured.

*Response:*

In addition to fenceline receptors, several receptor grids have been added to the air quality and human health risk assessment analyses per SCAQMD comments, as shown on **Figure 1**. A total of up to 439 receptors have been added to the Project area beyond the LAX fenceline, in areas where pollutant concentrations are projected to be highest. As shown on **Figures 2** through **4**, maximum concentrations remain along the fenceline for the 2013 Operations peak concentrations, 2016 Construction peak concentrations, and 2016 Operations peak concentrations, respectively.

6R-24L\_RSA-AR00001-7

*Comment:*

- c. The Lead Agency used EDMS to assign elevations of the sources and receptors in the AERMOD dispersion modeling. While it is acceptable to use EDMS to assign the elevations of the various airport sources (such as take-off and landing of aircraft), SCAQMD staff recommends that the Lead Agency use AERMAP to assign the elevations of the receptors used in the AERMOD modeling.

*Response:*

Receptor data for the air quality and human health risk assessment analysis has been revised to include actual elevations. AERMAP was used to assign elevations to all 766 receptors based on existing U.S. Geological Survey terrain data. Elevation contours for the Project area are shown on Figure 1.

## 6R-24L\_RSA-AR00001-8

### *Comment:*

- d. In the AERMOD input files, a custom coordinate system was used due to limitations in EDMS. The coordinates are in the UTM system but the Y-coordinate had 3,000,000 meters subtracted from it. In order to ensure that the elevations for each receptor are assigned correctly, SCAQMD staff recommends that for AERMOD modeling, the Lead Agency convert all UTM coordinates back by adding 3,000,000 meters to the Y-coordinate and run AERMAP to assign the elevations.

### *Response:*

The custom coordinate system in AERMOD has been rectified to UTM coordinates, as shown on Figure 1. As stated in Response to Comment 6R-24L\_RSA-AR00001-4, AERMAP was used to assign elevations to all receptor points based on existing terrain data.

## 6R-24L\_RSA-AR00001-9

### *Comment:*

- e. In the AERMOD input file, an hourly emission file was used with the sources. However, the Air Quality analysis did not include a description of the hourly emission profile and this file was not included in the electronic files provided to SCAQMD staff for review. Therefore, SCAQMD staff recommends the Lead Agency include a description of the hourly emission profiles used and then submit the electronic files when responding to SCAQMD staff comments for review.

### *Response:*

EDMS (the FAA-required model for airport air quality analysis of aviation sources) was used to compute the hourly emissions for each source associated with the proposed Project. Inputs into EDMS include aircraft and engine type, flight schedule, and gating and runway assignments. As an output from EDMS, the hourly emissions file (HRE) consists of approximately 5,000 airfield sources, and gives an emission rate in grams per second (g/s) for each hour of 2013 (8,760 hours). The HRE for all scenarios and pollutants have been provided to SCAQMD for review.

## 6R-24L\_RSA-AR00001-10

### *Comment:*

2. Based on the project description, the Lead Agency's construction equipment list includes portable generators, air compressors, and aggregate crushing/screen equipment. The Lead Agency is reminded that this portable equipment would require a SCAQMD permit under SCAQMD Rule 203(a) if operated anywhere at the airport after a one year period. Should the Lead Agency have any permit related questions concerning this equipment, SCAQMD Engineering and Compliance staff can be contacted at (909) 396-2718.

### *Response:*

LAWA will coordinate with SCAQMD to obtain all necessary permits prior to construction.

Table 2: 2013 Operations Peak Concentrations

POLLUTANT	AVERAGING PERIOD	BACKGROUND ( $\mu\text{g}/\text{m}^3$ )	ORIGINAL RESULTS		REFINED RESULTS		THRESHOLD ( $\mu\text{g}/\text{m}^3$ )	SIGNIFICANT?
			INCREMENTAL OPERATIONS <sup>1/</sup> ( $\mu\text{g}/\text{m}^3$ )	TOTAL ( $\mu\text{g}/\text{m}^3$ )	INCREMENTAL OPERATIONS <sup>1/</sup> ( $\mu\text{g}/\text{m}^3$ )	TOTAL ( $\mu\text{g}/\text{m}^3$ )		
CO	1-hr	3,534	146	3,680	57	3,591	23,000	No
	1-hr NAAQS	3,534	146	3,680	57	3,591	40,000	No
	8-hr	2,861	54	2,915	40	2,901	10,000	No
NO <sub>2</sub>	1-hr	184	60	245	48	232	339	No
	1-hr NAAQS	113	39	152	30	143	188	No
	Annual	24	5	30	5	29	57	No
SO <sub>2</sub>	1-hr	68	36	104	28	96	655	No
	1-hr NAAQS	21	19	39	16	37	196	No
	3-hr	39	14	53	11	50	1,300	No
	24-hr	16	3	19	2	18	105	No
	Annual NAAQS	3	1	4	0.7	3	80	No
PM <sub>10</sub>	24-hr	-	0.5	0.5	0.3	0.3	2.5	No
	Annual	-	0.2	0.2	0.1	0.1	1.0	No
PM <sub>2.5</sub>	24-hr	-	0.5	0.2	0.3	0.3	2.5	No

NOTE: Numbers may not add due to rounding.

<sup>1/</sup> The incremental difference between the 2013 With Project and 2013 existing conditions.

SOURCE: Ricondo & Associates Inc., April 2015.

PREPARED BY: Ricondo & Associates Inc., April 2015.

Table 3: 2016 Construction Peak Concentrations

POLLUTANT	AVERAGING PERIOD	BACKGROUND ( $\mu\text{g}/\text{m}^3$ )	ORIGINAL RESULTS		REFINED RESULTS		THRESHOLD ( $\mu\text{g}/\text{m}^3$ )	SIGNIFICANT?
			INCREMENTAL CONSTRUCTION <sup>1/</sup> ( $\mu\text{g}/\text{m}^3$ )	TOTAL ( $\mu\text{g}/\text{m}^3$ )	INCREMENTAL CONSTRUCTION <sup>1/</sup> ( $\mu\text{g}/\text{m}^3$ )	TOTAL ( $\mu\text{g}/\text{m}^3$ )		
CO	1-hr	3,534	256	3,790	149	3,683	23,000	No
	1-hr NAAQS	3,534	256	3,790	149	3,683	40,000	No
	8-hr	2,861	39	2,900	26	2,888	10,000	No
NO <sub>2</sub>	1-hr	184	26	210	29	214	339	No
	1-hr NAAQS	113	6	119	6	119	188	No
	Annual	24	0.5	25	2	26	57	No
SO <sub>2</sub>	1-hr	68	12	80	7	75	655	No
	1-hr NAAQS	21	10	31	12	33	196	No
	3-hr	39	9	48	6	45	1,300	No
	24-hr	16	2	18	1.3	17	105	No
	Annual NAAQS	3	0.8	3	0.4	3	80	No
PM <sub>10</sub>	24-hr	-	1.8	1.8	1.4	1.4	10.4	No
	Annual	-	0.3	0.3	0.2	0.2	1.0	No
PM <sub>2.5</sub>	24-hr	-	0.7	0.7	0.5	0.5	10.4	No

NOTE:

<sup>1/</sup> The incremental construction concentrations include aircraft and construction equipment.

SOURCE: Ricondo &amp; Associates Inc., April 2015.

PREPARED BY: Ricondo &amp; Associates Inc., April 2015.

Table 4: 2016 Operations Peak Concentrations

POLLUTANT	AVERAGING PERIOD	BACKGROUND ( $\mu\text{g}/\text{m}^3$ )	ORIGINAL RESULTS		REFINED RESULTS		THRESHOLD ( $\mu\text{g}/\text{m}^3$ )	SIGNIFICANT?
			INCREMENTAL OPERATIONS <sup>1/</sup> ( $\mu\text{g}/\text{m}^3$ )	TOTAL ( $\mu\text{g}/\text{m}^3$ )	INCREMENTAL OPERATIONS <sup>1/</sup> ( $\mu\text{g}/\text{m}^3$ )	TOTAL ( $\mu\text{g}/\text{m}^3$ )		
CO	1-hr	3,534	107	3,641	92	3,626	23,000	No
	1-hr NAAQS	3,534	107	3,641	92	3,626	40,000	No
	8-hr	2,861	29	2,891	19	2,880	10,000	No
NO <sub>2</sub>	1-hr	184	93	277	58	243	339	No
	1-hr NAAQS	113	19	132	20	133	188	No
	Annual	24	2	26	2	26	57	No
SO <sub>2</sub>	1-hr	68	18	86	9	77	655	No
	1-hr NAAQS	21	12	33	8	29	196	No
	3-hr	39	11	50	7	46	1,300	No
	24-hr	16	2	17	1	17	105	No
	Annual NAAQS	3	0.5	3	0.3	3	80	No
PM <sub>10</sub>	24-hr	-	0.1	0.1	0.1	0.1	2.5	No
	Annual	-	0.1	0.1	0.0	0.0	1.0	No
PM <sub>2.5</sub>	24-hr	-	0.1	0.1	0.1	0.1	2.5	No

NOTE: Numbers may not add due to rounding.

<sup>1/</sup> The incremental difference between the 2016 With Project and 2016 Without Project scenarios.

SOURCE: Ricondo & Associates Inc., April 2015.

PREPARED BY: Ricondo & Associates Inc., April 2015.

**Table 5: Comparison of CalOSHA Permissible Exposure Limits to  
Maximum Estimated 8-Hour On-Site Air Concentrations**

TOXIC AIR CONTAMINANT <sup>1/</sup>	ORIGINAL RESULTS		REFINED RESULTS		CALOSHA PEL TWA (mg/m <sup>3</sup> )
	CONSTRUCTION CONCENTRATIONS (mg/m <sup>3</sup> ) <sup>2/</sup>	OPERATION CONCENTRATIONS (mg/m <sup>3</sup> ) <sup>2/</sup>	CONSTRUCTION CONCENTRATIONS (mg/m <sup>3</sup> ) <sup>2/</sup>	OPERATION CONCENTRATIONS (mg/m <sup>3</sup> ) <sup>2/</sup>	
Acetaldehyde	0.0020479	0.0013326	0.0018524	0.0003408	45
Acrolein	0.0003043	0.0007639	0.0003220	0.0001953	0.25
Benzene	0.0006161	0.0005244	0.0005580	0.0001341	0.32
1,3-Butadiene	0.0002316	0.0005262	0.0002226	0.0001346	2.2
Ethylbenzene	0.0000846	0.0000543	0.0000765	0.0000139	435
Formaldehyde	0.0045244	0.0038399	0.0040978	0.0009819	0.37
Hexane, n-	0.0000334	0.0000000	0.0000301	0.0000000	180
Methanol	0.0002110	0.0005630	0.0002368	0.0001440	260
Methyl ethyl ketone	0.0005187	0.0005630	0.0004705	0.0001440	590
Naphthalene	0.0000794	0.0001688	0.0000725	0.0000432	50
Propylene	0.0010662	0.0014143	0.0009687	0.0003617	N/A
Styrene	0.0000474	0.0000964	0.0000432	0.0000246	215
Toluene	0.0003860	0.0002003	0.0003489	0.0000512	37
Xylene (total)	0.0002722	0.0001397	0.0002460	0.0000357	435
Diesel PM	0.0021536	0.000000	0.0015189	0.0000000	N/A
Arsenic	0.0000010	0.000000	0.0000007	0.0000000	0.01
Cadmium	0.0000017	0.000000	0.0000012	0.0000000	0.005
Chlorine	0.0001746	0.000000	0.0001231	0.0000000	1.5
Chromium (VI)	0.0000005	0.000000	0.0000004	0.0000000	0.005
Copper	0.0000057	0.000000	0.0000040	0.0000000	1
Lead	0.0000288	0.000000	0.0000203	0.0000001	0.05
Manganese	0.0000471	0.000000	0.0000332	0.0000000	0.2
Mercury	0.0000009	0.000000	0.0000006	0.0000000	0.025
Nickel	0.0000032	0.000000	0.0000022	0.0000000	0.5
Selenium	0.0000001	0.000000	0.0000001	0.0000000	0.2
Silicon	0.0099896	0.000000	0.0070412	0.0000000	6
Sulfates	0.0002788	0.000000	0.0001965	0.0000000	N/A
Vanadium	0.0000136	0.000000	0.0000096	0.0000000	0.05

NOTES: N/A = Not Available

1/ All TACs for which PEL-TWAs are available are listed. PEL-TWAs are not available for diesel exhaust, propylene, and sulfates.

2/ Maximum 1-hour concentrations at on-airport location converted to 8-hour averages by multiplying by a factor of 0.7.

SOURCE: Ricondo & Associates, Inc., April 2015.

PREPARED BY: Ricondo & Associates, Inc., April 2015.



**Table 6: Incremental Cancer Risks and Chronic Non-Cancer Human Health Hazards for Maximally Exposed Individuals from the Proposed Project**

	ORIGINAL RESULTS		REFINED RESULTS			
RECEPTOR TYPE	CONSTRUCTION	OPERATIONS	CONSTRUCTION	OPERATIONS	SIGNIFICANCE THRESHOLD	SIGNIFICANT?
Incremental Cancer Risks <sup>1/</sup> (per million people)						
Child Resident	0.007	0.001	0.005	0.001	10	No
School Child	0.001	0.0002	0.001	0.0001	10	No
Adult Resident	0.085	0.009	0.057	0.006	10	No
Adult Worker	0.193	0.031	0.125	0.016	10	No
Incremental Non-Cancer Chronic Hazards <sup>2/</sup>						
Child Resident	0.0064	0.0125	0.0011	0.0081	1	No
School Child	0.0012	0.0024	0.0002	0.0015	1	No
Adult Resident	0.0064	0.0125	0.0011	0.0081	1	No
Adult Worker	0.1224	0.0720	0.0137	0.0378	1	No

## NOTES:

1/ Values provided are changes in the number of cancer cases per million people exposed as compared to baseline conditions. All estimates are rounded to one significant figure.

2/ Hazard indices are totals for all TACs that may affect the respiratory system. This incremental hazard index is essentially equal to the total for all TACs.

SOURCE: Ricondo & Associates, Inc., April 2015.

PREPARED BY: Ricondo & Associates, Inc., April 2015.

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**Table 7: Maximum Incremental Acute Non-Cancer Hazard Indices from Construction and Operations**

POLLUTANT	CONSTRUCTION						OPERATIONS			
	ORIGINAL RESULTS			REFINED RESULTS			ORIGINAL RESULTS		REFINED RESULTS	
	ACROLEIN	FORMALD.	MANGANESE	ACROLEIN	FORMALD.	MANGANESE	ACROLEIN	FORMALD.	ACROLEIN	FORMALD.
<b>Residential</b>										
Maximum Hazard Index	0.16	0.04	0.06	0.18	0.04	0.03	0.05	0.01	0.04	0.01
Minimum Hazard Index	-0.66	-0.15	0.00	-0.19	-0.04	0.00	-0.31	-0.07	-0.21	-0.05
Average Hazard Index	0.05	0.02	0.01	0.05	0.01	0.01	-0.02	0.00	-0.01	0.00
<b>School</b>										
Maximum Hazard Index	0.14	0.03	0.03	0.10	0.03	0.02	0.00	0.00	0.00	0.00
Minimum Hazard Index	-0.07	-0.01	0.01	-0.06	-0.01	0.00	-0.01	0.00	-0.03	-0.01
Average Hazard Index	0.08	0.02	0.02	0.07	0.02	0.01	0.00	0.00	0.00	0.00
<b>Offsite Worker</b>										
Maximum Hazard Index	0.48	0.11	0.13	0.25	0.06	0.09	0.11	0.02	0.09	0.02
Minimum Hazard Index	-0.17	-0.04	0.00	-0.22	-0.05	0.00	-0.28	-0.07	-0.25	-0.06
Average Hazard Index	0.07	0.02	0.02	0.06	0.01	0.01	-0.01	0.00	0.00	0.00
<b>Recreational</b>										
Maximum Hazard Index	0.18	0.04	0.02	0.15	0.04	0.02	0.00	0.00	0.00	0.00
Minimum Hazard Index	0.02	0.01	0.01	0.02	0.01	0.00	-0.03	-0.01	-0.03	-0.01
Average Hazard Index	0.11	0.03	0.01	0.09	0.02	0.01	-0.01	0.00	-0.01	0.00
<b>Overall Off-Airport</b>										
Maximum Hazard Index	0.48	0.11	0.13	0.25	0.06	0.09	0.11	0.00	0.09	0.02
<b>On-Site Occupational</b>										
Maximum Hazard Index	0.24	0.12	0.40	0.10	0.02	0.03	0.00	0.00	0.00	0.00

SOURCE: Ricondo &amp; Associates, Inc., April 2015.

PREPARED BY: Ricondo &amp; Associates, Inc., April 2015.

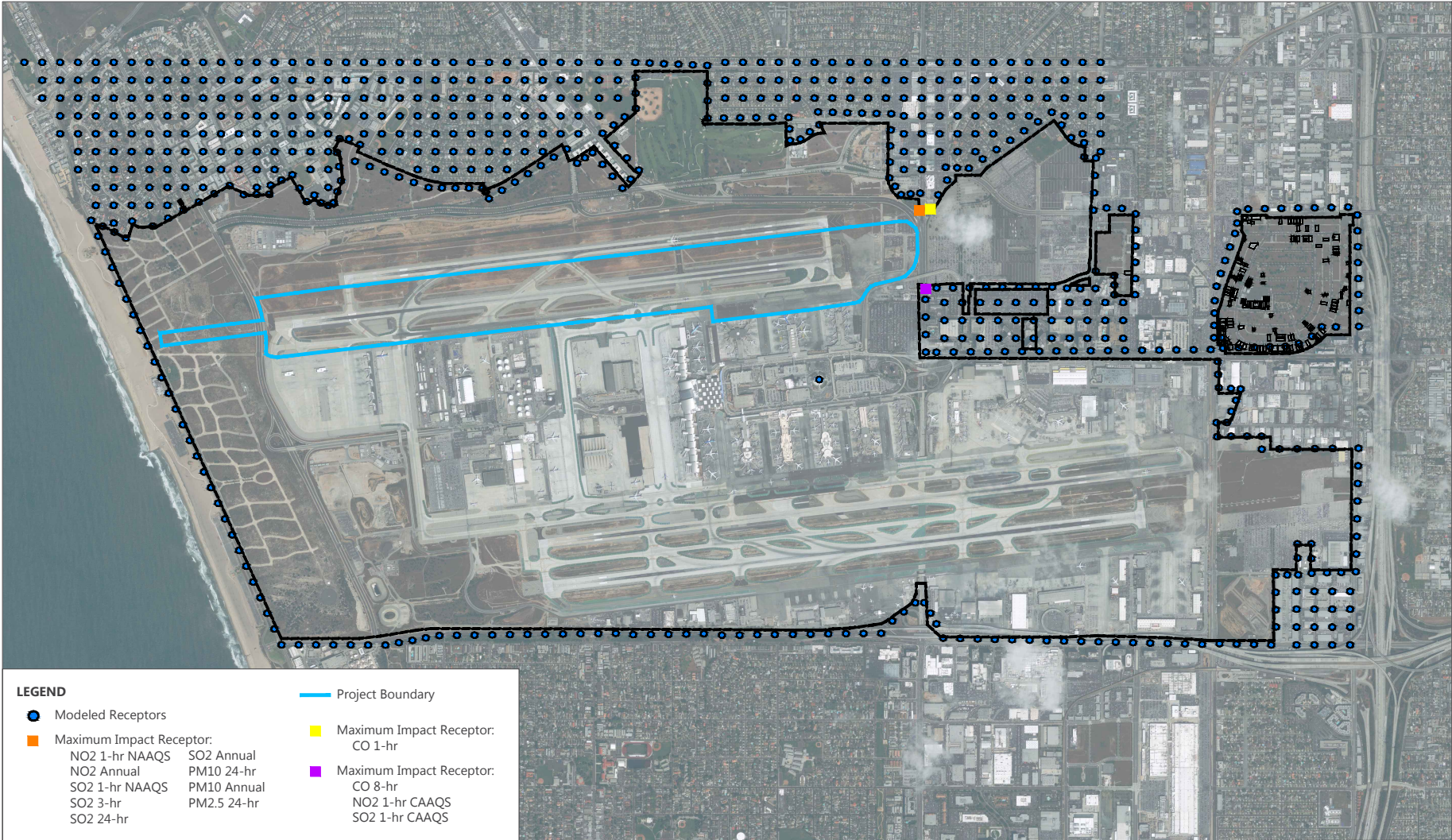
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Revised Receptor Locations and Terrain

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SOURCE: Los Angeles World Airports, April 2013 (aerial photography- for visual reference only, may not be to scale); Ricondo & Associates, Inc., April 2015.  
PREPARED BY: Ricondo & Associates, Inc., April 2015.

FIGURE 2

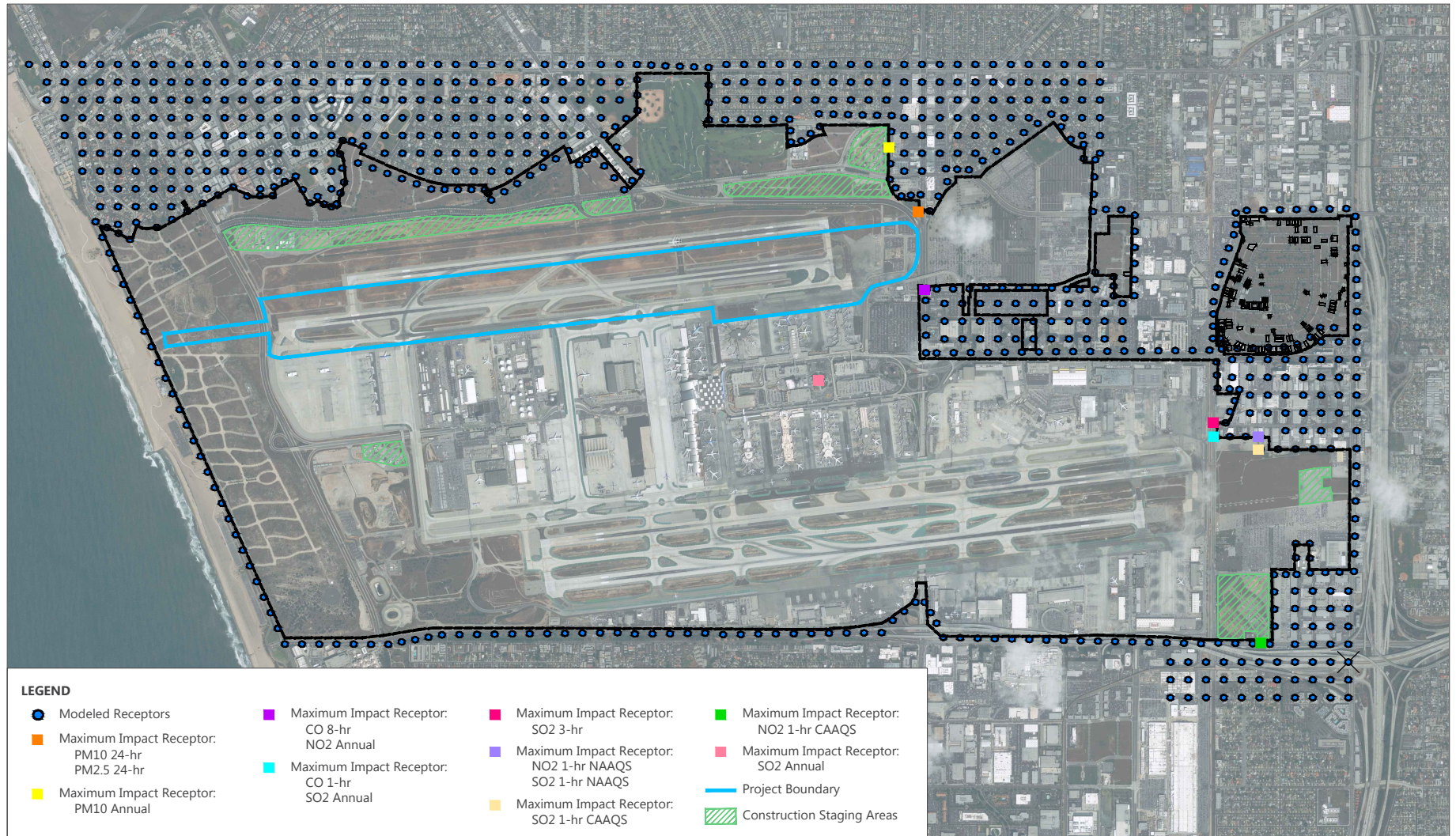
## 2013 Operations Peak Receptor Locations

Runway 6R-24L Runway Safety Area Improvements  
Los Angeles International Airport



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SOURCE: Los Angeles World Airports, April 2013 (aerial photography- for visual reference only, may not be to scale); Ricondo & Associates, Inc., April 2015.  
PREPARED BY: Ricondo & Associates, Inc., April 2015.

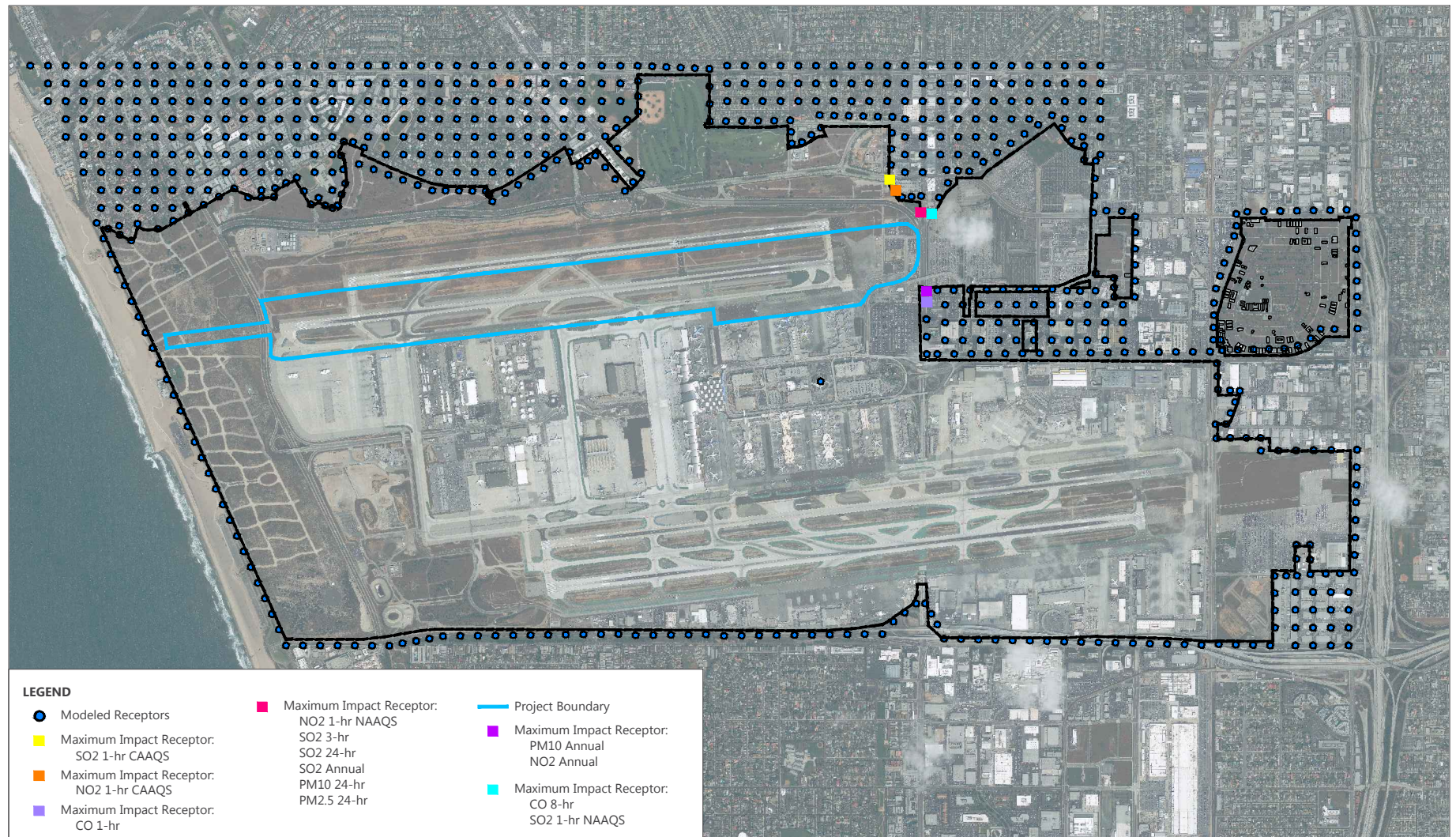
FIGURE 3

## 2016 Construction Peak Receptor Locations



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SOURCE: Los Angeles World Airports, April 2013 (aerial photography- for visual reference only, may not be to scale); Ricondo & Associates, Inc., April 2015.  
PREPARED BY: Ricondo & Associates, Inc., April 2015.

FIGURE 4

## 2016 Operations Peak Receptor Locations



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6R-24L\_RSA-PC00001

Keating, Edward

03/16/2015

## 6R-24L\_RSA-PC00001-1

### Comment:

As both a neighbor and user of Los Angeles International Airport, I would like to emphasize the pre-eminent importance of the safety of airport operations. In that vein, it surprises me that the draft environmental assessment for the Runway 6R-24L RSA makes no allusion, as far as I can tell, to the February 2, 1991 runway incursion crash at LAX between USAir flight 1493 and SkyWest Airlines flight 5569. That crash, as you know, killed 35 individuals, as well as destroying both aircraft. While the direct causes of that accident have, fortunately, already been addressed, that tragedy reminds us of the importance of runway issues at LAX. It seems to me, therefore, that a very strong presumption should be made in favor of projects of this sort that will yet further increase the safety of operations at LAX.

### Response:

Comment noted. The February 2, 1991 incident was unrelated to runway safety areas (RSAs). As noted in Volume 1 of the Final IS/MND, LAWA proposes to enhance the RSA at LAX to comply with the requirements of the *Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act, 2006* (Public Law 109-115) in November 2005. The proposed Project would enhance airfield safety and bring Runway 6R-24L into compliance with current FAA RSA standards.

6R-24L\_RSA-PC00002

Parris, Michael

03/24/2015

## 6R-24L\_RSA-PC00002-1

### Comment:

I need more than three minutes. He talked a half hour, you know. I've been a resident at 9608 Aviation Boulevard since 1958. I raised my family there. I sent them to school there. It's bounded by La Cienega, Aviation, Arbor Vitae and Century.

They have devastated our area all the way down from where we are, the airport, all the way down to El Segundo. Now they're going to finish the job and do the more affluent areas of Ladera Heights, Playa del Rey, Kentwood, Westborough Heights. And the conclusion to that was we sued the airport and we won, and very few people know about it. They never put it in the paper or anything, actually.

### Response:

Comment noted.



## 6R-24L\_RSA-PC00002-2

### *Comment:*

It went from seven years and we filed -- our lawyer filed an appeal because the offer was too low and the whole problem was the noise factor and they said, Well, from now on, we'll fly over the ocean. We'll start on the ocean and fly over the ocean and come in from the ocean. And everything's been beautiful for quite a few years.

### *Response:*

Over-Ocean Operations are voluntary measures employed by LAWA for noise abatement, since the 1970s. During the more noise-sensitive, nighttime period (between midnight and 6:30 a.m.), aircraft normally operate in accordance with the Over-Ocean Operations procedure. In this procedure, all landings and takeoffs usually occur on the "inner" runways at LAX (Runway 6R-24L and Runway 7L-25R). Aircraft continue to depart over the ocean to the west, as in normal westerly conditions, but arrive from over the ocean to the east. This reduces the noise impact on communities directly to the east of the airport during the most noise sensitive hours.

Over-Ocean Operations may be temporarily suspended and west flow aircraft operations after 12 midnight may be re-instituted if the FAA's Airport Traffic Control Tower determines that Over-the-Ocean Approaches cannot be conducted safely due to weather and/or air traffic conditions. Such conditions may include fog and low clouds at the shoreline, winds from the east, runway maintenance and repairs, navigational equipment problems, and air traffic considerations. The proposed Project will not permanently impact Over-Ocean Operations except during the second phase of the construction period, which is estimated to occur for approximately 6 months. LAWA and FAA will continue to use Over-Ocean Approaches to reduce aircraft noise impacts on the community as long as it can be done safely during construction activities.

## 6R-24L\_RSA-PC00002-3

### *Comment:*

Now all of a sudden they give me that safety factor, the FAA and the GAA and all these AA jobs. I mean, let's face it. I think what the people should do is get another lawyer like we had before and sue the airport again and show them that we live here. We don't care about two or three people's safety. If they think it's such a good deal, put it in their area, just like Santa Monica's fighting this thing down to the bone now, actually.

### *Response:*

As described in response to Comment 6R-24L\_RSA-PC00001-1, the proposed Project is being implemented in accordance with Public Law 109-115. Every airport in the United States that holds a certificate issued by the FAA under Title 14, Code of Federal Regulations, Part 139, *Certification of Airports*, is required to meet FAA airport design standards for RSAs by December 31, 2015.

**6R-24L\_RSA-PC00002-4***Comment:*

I think that the people are out of line. I think you made a deal to fly over the ocean, come in out over the ocean. Everything's been fine. All of a sudden, now you've got to increase the east runways. Actually, that allows bigger jets to fly in. And eventually they'll say, Well, we changed our mind. We thought it was that way to begin with now, but now we have to do it another way.

*Response:*

Please see response to Comment 6R-24L\_RSA-PC00002-2. The proposed Project would not increase the runway length available for aircraft operations, nor would it affect the number or type of aircraft that operate at LAX. The proposed Project would result in some aircraft starting their departure approximately 800 feet east of where departures start today, using a displaced threshold to begin their takeoff roll. Although the commenter did not specifically mention concern over noise impacts, Volume 1, Chapter 2, Section XII of the Draft IS/MND presents the results of the noise analysis conducted for the Project. As noted in Section XII, noise impacts associated with the proposed Project would be less than significant.

**6R-24L\_RSA-PC00002-5***Comment:*

It's just a lot of conversation and I would suggest that the people that live in these areas get a good lawyer and fight the City as much as they can. I'll put up a few bucks. I don't know if the rest want to do it, actually, and tell them that we're sick and tired of this pushing and shoving. And if you think it's so good, put it in your area.

That's my comments.

*Response:*

Comment noted.

---

6R-24L\_RSA-PC00003

Parris, Michael

03/24/2015

---

**6R-24L\_RSA-PC00003-1***Comment:*

I'd like to reiterate, actually, the frustration that I felt over the years, actually, listening to all this hogwash all the time about my safety and this and that. And what the FAA said, I could give a damn, less, what they say, actually.

*Response:*

Comment noted.

**6R-24L\_RSA-PC00003-2***Comment:*

I am a World War II combat veteran. I served my country. I pay taxes, actually, and now all of a sudden we came to an agreement in the lawsuit to fly over the ocean and now all of a sudden, what are you doing? Now you want to increase the east runway.

*Response:*

Comment noted. Please see responses to Comments 6R-24L\_RSA-PC00002-2 and 6R-24L\_RSA-PC00002-4.

**6R-24L\_RSA-PC00003-3***Comment:*

I've been hearing planes for three weeks now that I haven't heard for years, actually.

*Response:*

Increased aircraft noise during the months of March and April 2015 were due to temporary closures of Runway 7R-25L in order to conduct emergency maintenance repairs. During this time, persons living near LAX may have noticed a change in aircraft flight activity and noise; however, this increase in noise was temporary.

**6R-24L\_RSA-PC00002-4***Comment:*

You keep changing your mind and changing your tune and I could care less about it. I figure we have some right on the ground, too. Never mind the people flying. The people on the ground have a few rights, too, actually, and they've destroyed every area and now they're going to finish the job.

You're going to ruin some real nice area, some influential areas; like I said, the marina and Ladera and Kentwood and Westborough Heights. They're going to finish the job, actually.

I think that -- I hope that the people get together. I'm surprised there isn't more people here -- they're afraid to speak up -- there's more people here, but I tell you one thing. They'll learn their lesson before it's all said and done. They'll wish they would have come up here and said a few words.

*Response:*

Comment noted. LAWA will continue its voluntary residential acquisition program in Manchester Square and Belford. LAWA has no plans to acquire land in Marina Del Rey, Ladera Heights, Kentwood or Westborough Heights.



## 3. Corrections and Additions to the Draft IS/MND

### 3.0 Introduction

This chapter provides changes as a result of clarifications to, and comments received on, the Draft IS/MND for the proposed Project. The following revisions are hereby made to the text of the Draft IS. Changes in the text are signified by ~~strikeouts~~ where text is removed and shown with underline where text is added, unless otherwise noted. These changes do not add significant new information to the IS/MND, nor do they disclose or suggest new or more severe significant environmental impacts of the Project.

### 3.1 Corrections and Additions to the Draft IS/MND Text

#### CHAPTER 1 PROJECT DESCRIPTION

##### 1.5 Project Characteristics

Revise the following text in Section 1.5.1, *Existing Conditions*, on page 22, as follows:

As illustrated in Figure 2, the existing RSA for Runway 6R-24L is 500 feet wide for the full length of the runway; it extends 165 feet from the west end of the runway and 885 feet from the east end. The existing RSA at the west end is 835 feet short of meeting the RSA standard beyond the runway end for Runway 24L departures. Runway 6R also has a displaced threshold of 331 feet. A displaced threshold is a threshold that is located at a point on the runway beyond the beginning of the runway. It is in place due to obstructions off the end of Runway 6R (namely dunes) that penetrate the 14 CFR Part 77 approach surface that begins at the end of Runway 6R. With the existing 331-foot displaced threshold, the 14 CFR Part 77 approach surface clears these obstructions. With this displaced threshold, the RSA 600-foot length requirement prior to the Runway 6R arrival threshold is 104 feet short of meeting the FAA standard. On the east end, at 885 feet the Runway 24L RSA is 115 feet short of meeting standard RSA dimensions. The existing RSA meets the 600-foot RSA length prior to the Runway 24L arrival threshold for landings. LAWA will implement declared distances to provide the 1,000-foot length requirement beyond the runway end for Runway 6R arrivals and departures, which was

approved as part of the Runway 6L-24R and Runway 6R-24L Runway Safety Area and Associated Improvements Project EA.

Revise the following text in Section 1.5.2, *Runway 6R-24L RSA Proposed Improvements*, on page 31, as follows:

- Runway 6R (West End)
  - Shift Runway 24L endpoint by constructing approximately 800 feet of new runway pavement to the east. The landing threshold would remain in its current location and pavement marked as a displaced threshold;
    - Relocate the existing ILS Runway 6R Localizer Antenna and equipment shelter to the east;

Revise the following text in Section 1.5.2.1, *Shift Runway 6R End*, on page 32, as follows:

Runway 6R is equipped with an instrument landing system (ILS) for Category (CAT) I approaches and a Medium Intensity Approach Light System with Runway Alignment Indicator Lights (MALSR). This equipment provides electronic vertical and horizontal guidance to aircraft approaching and landing on this runway using radio signals and a high-intensity lighting array to enable a safe landing when the visibility is reduced (fog or rain). The shift in the Runway 6R threshold will require the relocation of portions of the ILS and approach lighting system, namely the glide slope antenna, equipment shelter, Precision Approach Path Indicators (PAPI), and MALSR. The glide slope antenna provides vertical guidance information indicating aircraft position above, below, or along the proper descent angle to the runway touchdown point. It is optimally positioned in relation to the runway threshold to provide a 3 degree glide slope with a specified threshold crossing height for landing aircraft. The PAPI system provides visual approach slope information along the desired descent path to the touchdown point.

In addition to text changes, the exhibits included in the Draft Initial Study showed the future LAX property boundary once voluntary acquisition of Manchester Square and Belford is completed. LAWA has been acquiring these properties since 1997 on a voluntary basis as part of the Voluntary Acquisition Residential Acquisition and Relocation Program under the Aircraft Noise Mitigation Program (ANMP). While LAWA has acquired approximately 90 percent of the property in the Manchester Square and Belford areas, it does not own all of them. The following exhibits have been revised, as described below, and they show the correct LAX property boundary as of the date of this document:

- **Figure 9:** Potential Construction Staging Areas. This figure has been updated to reflect the availability of one construction staging area in the southwest portion of the airfield. Only a portion of the original area would be available for construction staging for the proposed Project.
- **Figure 11:** Detailed Study Area and Area of Potential Effect. Consistent with the update to Figure 9, Figure 11 has been updated to reflect the availability of the construction staging areas.
- **Figure 12:** 2016 Construction CNEL 1.5 dBA Increase. Land uses were originally inadvertently left out of the legend. The revised figure has corrected the legend.

- **Figure 15:** 2016 With Project CNEL 1.5 dBA or Greater Increase. Land uses were originally inadvertently left out of the legend. The revised figure has corrected the legend.

## CHAPTER 2 EXPLANATION OF INITIAL STUDY CHECKLIST DETERMINATIONS

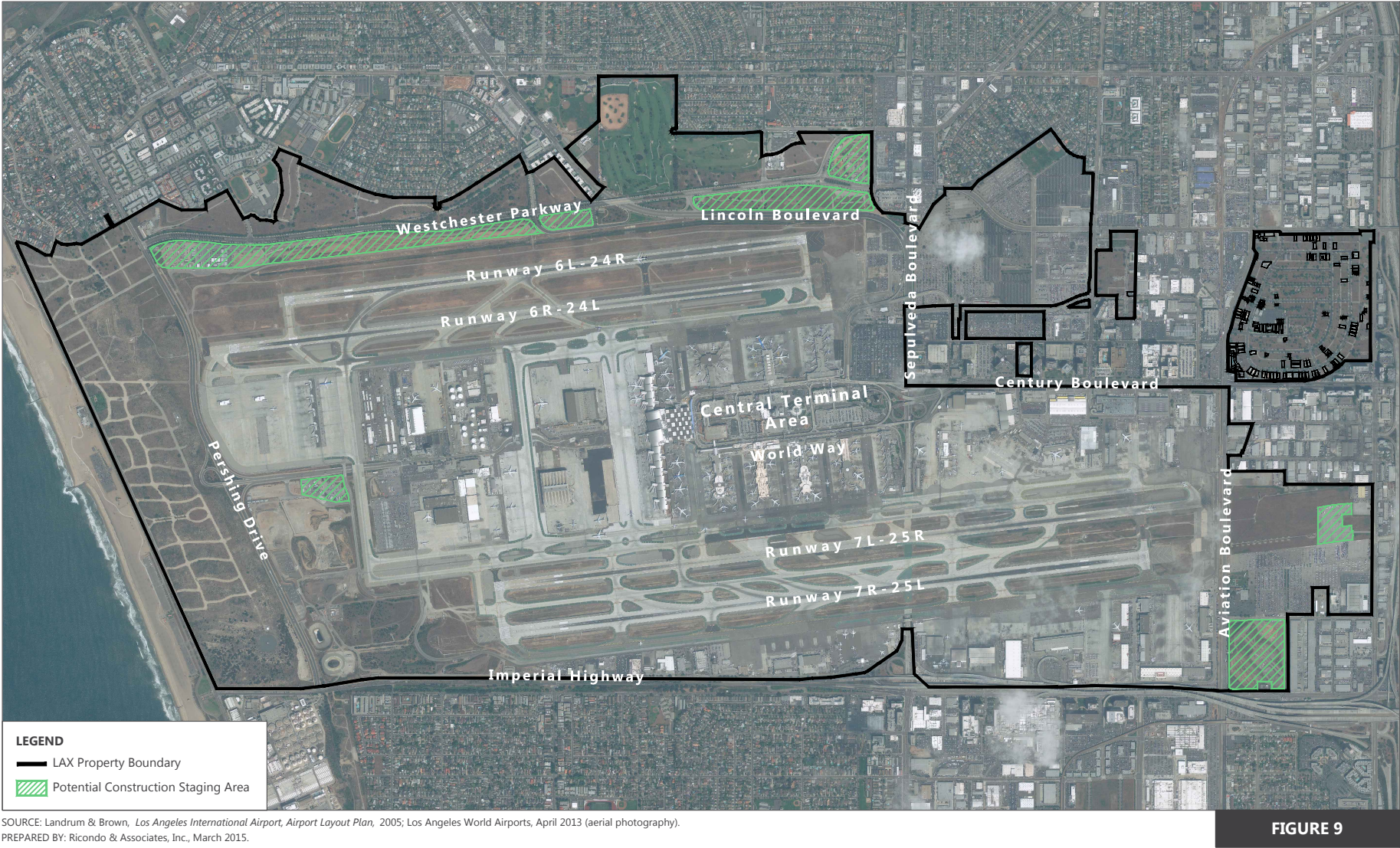
### IV. Biological Resources

Revise the following information under “Wildlife – Nesting Birds”, on page 90, as follows:

Several species of birds were presumed to be nesting in vegetated areas outside the study area based on behavioral cues. The U.S. Fish and Wildlife Service (USFWS) has issued a Federal Fish and Wildlife Permit to LAWA for the Depredation of Migratory Birds at Airports, which allows the take of specific (not all) native bird species and their nests for those species that are not threatened or endangered. Harassment and/or removal of endangered/threatened species and/or bald and golden eagles require additional permits from the Migratory Bird Permit Office and/or Ecological Services Office.

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Potential Construction Staging Areas

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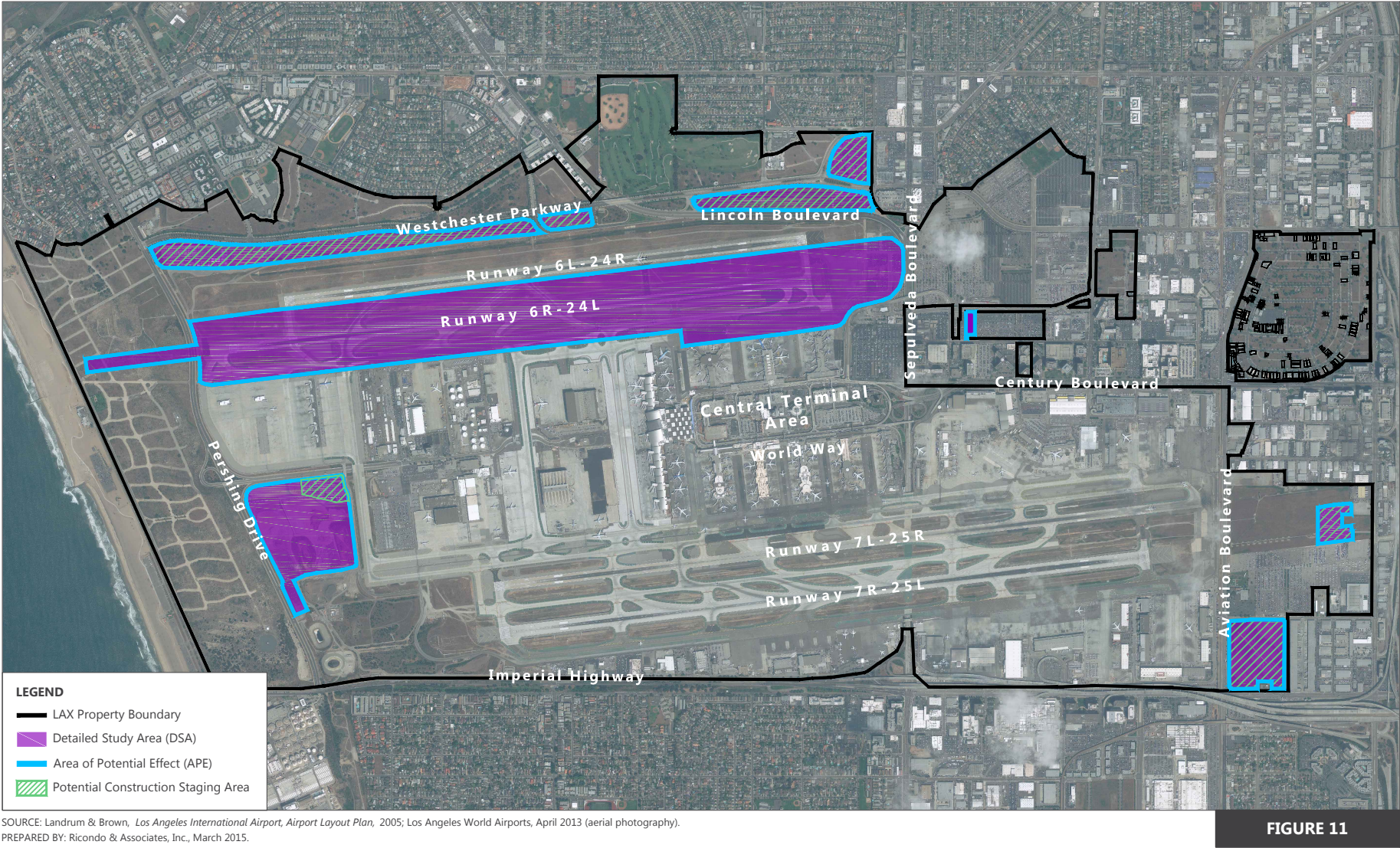


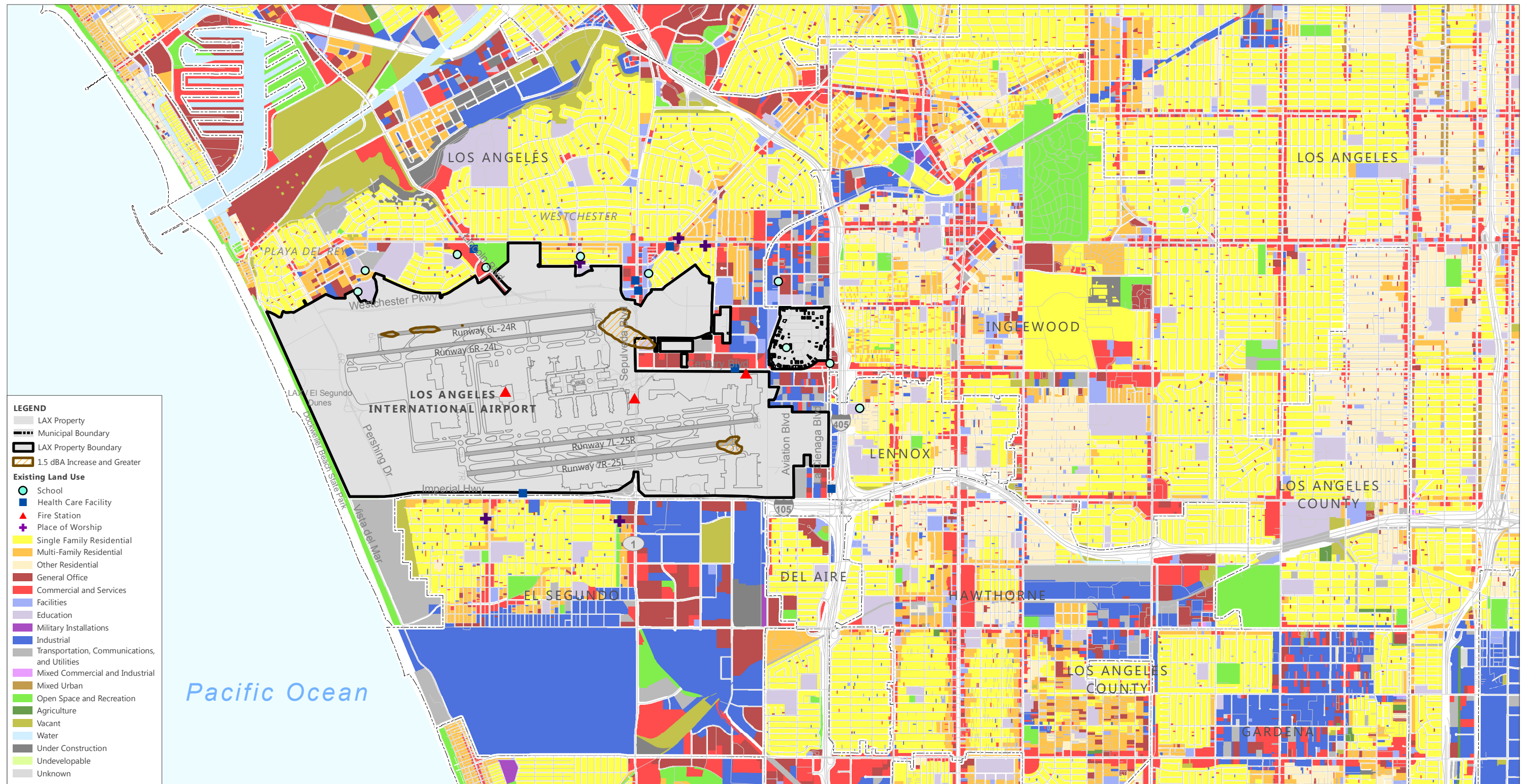
FIGURE 11



Detailed Study Area and Area of Potential Effect

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SOURCES: Los Angeles County, 2010, 2011 (city boundary, streets); LAX Airport Layout Plan, Ricondo & Associates, Inc., 2010 (runways, taxiways, terminal area, airport property boundary).  
 South California Association of Governments (land use), 2008.  
 PREPARED BY: Ricondo & Associates, Inc., March 2015.

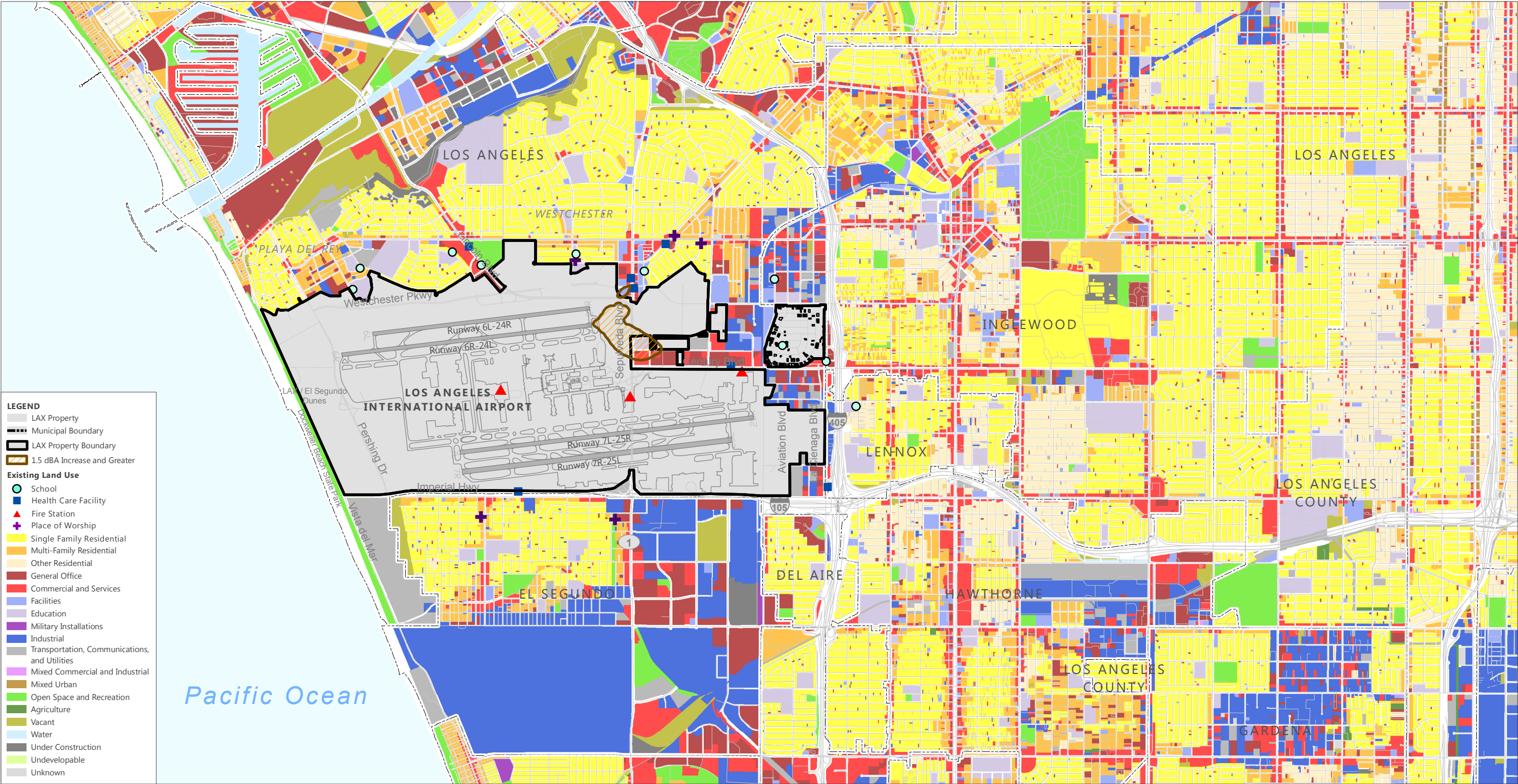


FIGURE 12

CNEL 1.5 dBA or Greater Increase During Construction Period

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SOURCES: Los Angeles County, 2010, 2011 (city boundary, streets); LAX Airport Layout Plan, Ricondo & Associates, Inc., 2010 (runways, taxiways, terminal area, airport property boundary).  
South California Association of Governments (land use), 2008.  
PREPARED BY: Ricondo & Associates, Inc., March 2015.



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FIGURE 15

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## **Appendix A**

Draft Initial Study/Proposed Mitigated Negative Declaration  
Notice of Intent and Newspaper Notices





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

STATE OF CALIFORNIA  
County of Los Angeles

I am a citizen of the United States and a resident of the County aforesaid; I am over the age of eighteen years, and not a party to or interested in the above-entitled matter. I am the principal clerk of the printer of The Argonaut, a newspaper of general circulation, printed and published weekly in the County of Los Angeles, State of California, under the date of March 7, 1973, modified October 5, 1976, Case Number C47170; that 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:

\_\_\_\_\_  
All in the year 2015

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

Dated at 25<sup>th</sup> Day of March

California, Los Angeles

Signature:

*Tiyana Dennis*

Tiyana Dennis

Proof of Publication of

See Attached.



Located at 5355 McConnell Ave.,  
Los Angeles, CA 90066  
(310) 822-1629 x 103

NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION

March 19, 2015

City Clerk #NG-15-122-AD

**Project Title:** Los Angeles International Airport (LAX) Runway 6R-24L Runway Safety Area (RSA) Improvements Project

**Project Location:**

The project site is located in LAX, within the City of Los Angeles, an incorporated city within Los Angeles County. The RSA components of the proposed Project are located on the north airfield of LAX with the Central Terminal Area (CTA) to the south; Sepulveda Blvd. to the east; Westchester Pkwy. and Lincoln Blvd. to the north; and Pershing Dr. and Vista del Mar Blvd. to the west. The taxicab holding/staging area would be relocated to an existing parking lot located on LAX property, generally bounded by West 96th St., Vicksburg Ave., and West 98th St.

**Lead Agency:** Los Angeles World Airports (LAWA)

**Description of Project:**

The intent of the proposed Project is to comply with the *Transportation, Treasury, Housing and Urban Development, the Judiciary, District of Columbia, and Independent Agencies Appropriations Act, 2006* (Public Law [P.L.] 109-115), November 30, 2005. P.L. 109-115 requires completion of RSA improvements by airport sponsors that hold a certificate under Title 14, Code of Federal Regulations (CFR), Part 139, *Certification and Operations: Land Airports Serving Certain Air Carriers*, such as LAX, to meet Federal Aviation Administration (FAA) airport design standards by December 31, 2015. LAWA prepared an RSA Practicability Study and concluded that the existing RSA for Runway 6R-24L does not meet current FAA airport design standards and improvements to the RSA were needed. Elements of the proposed Project can be found online by visiting [www.ourlax.org](http://www.ourlax.org).

**Relationship to Draft Environmental Assessment (DEA):**

LAWA released a DEA on this same project on March 12, 2015. LAWA is required to assess and disclose potential environmental effects of the project under both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). Due to complexities and differences between the two Acts, two separate documents have been prepared. Comments on both documents are due by 5:00 p.m. on April 24, 2015.

**How to Comment on the Notice of Intent to Adopt a Mitigated Negative Declaration:**

Beginning on March 19, 2015, the proposed Mitigated Negative Declaration and Draft Initial Study will be available for public review through LAWA's website at <http://www.ourlax.org> under "Current Projects" and in the following locations through April 24, 2015: 1) LAWA Administrative Offices-One World Way #218, Los Angeles, CA 90045; 2) Westchester-Loyola Village Branch Library-7114 W. Manchester Ave., Los Angeles, CA 90045; 3) Playa Vista Branch Library-6400 Playa Vista Dr., Los Angeles, CA 90094; 4) Inglewood Library-101 W. Manchester Blvd., Inglewood, CA 90301; and 5) El Segundo Library-111 W. Mariposa Ave., El Segundo, CA 90245.



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SUITE 800  
LOS ANGELES CA 90045

**FILE NO. DB 3-58**

## 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:

**3/19/2015**

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

Dated at Torrance, California  
On this 20th day of March, 2015.



Signature

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

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Legal No. **0010644333**

**DB 3-58**

#### **NOTICE OF INTENT TO ADOPT A MITIGATED NEGATIVE DECLARATION March 19, 2015**

**City Clerk ##NG-15-122-AD**

**Project Title:** Los Angeles International Airport (LAX) Runway 6R-24L Runway Safety Area (RSA) Improvements Project

**Project Location:** The project site is located in LAX, within the City of Los Angeles, an incorporated city within Los Angeles County. The RSA components of the proposed Project are located on the north airfield of LAX with the Central Terminal Area (CTA) to the south; Sepulveda Blvd. to the east; Westchester Pkwy. and Lincoln Blvd. to the north; and Pershing Dr. and Vista del Mar Blvd. to the west. The taxicab holding/staging area would be relocated to an existing parking lot located on LAX property, generally bounded by West 96th St., Vicksburg Ave., and West 98th St.

**Lead Agency:** Los Angeles World Airports (LAWA)

**Description of Project:** The intent of the proposed Project is to comply with the Transportation, Treasury, Housing and Urban Development, the Judiciary, District of Columbia, and Independent Agencies Appropriations Act, 2006 (Public Law [P.L.] 109-115), November 30, 2005. P.L. 109-115 requires completion of RSA improvements by airport sponsors that hold a certificate under Title 14, Code of Federal Regulations (CFR), Part 139, Certification and Operations: Land Airports Serving Certain Air Carriers, such as LAX, to meet Federal Aviation Administration (FAA) airport design standards by December 31, 2015. LAWA prepared an RSA Practicability Study and concluded that the existing RSA for Runway 6R-24L does not meet current FAA airport design standards and improvements to the RSA were needed. Elements of the proposed Project can be found online by visiting [www.ourlax.org](http://www.ourlax.org).

**Relationship to Draft Environmental Assessment (DEA):** LAWA released a DEA on this same project on March 12, 2015. LAWA is required to assess and disclose potential environmental effects of the project under both the National Environmental Policy Act (NEPA) and the California Environmental Quality Act (CEQA). Due to complexities and differences between the two Acts, two separate documents have been prepared. Comments on both documents are due by 5:00 p.m. on April 24, 2015.

**How to Comment on the Notice of Intent to Adopt a Mitigated Negative Declaration:** Beginning on March 19, 2015, the proposed Mitigated Negative Declaration and Draft Initial Study will be available for public review through LAWA's website at <http://www.ourlax.org> under "Current Projects" and in the following locations through April 24, 2015: 1) LAWA Administrative Offices-One World Way #218, Los Angeles, CA 90045; 2) Westchester-Loyola Village Branch Library-7114 W. Manchester Ave., Los Angeles, CA 90045; 3) Playa Vista Branch Library-6400 Playa Vista Dr., Los Angeles, CA 90094; 4) Inglewood Library-101 W. Manchester Blvd., Inglewood, CA 90301; and 5) El Segundo Library-111 W. Mariposa Ave., El Segundo, CA 90245.

**Published: March 19, 2015**

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STATE OF CALIFORNIA

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 La Opinión a newspaper of general circulation, printed and published daily in the city of Los Angeles, County of Los Angeles, and which newspaper has been adjudged a newspaper of general circulation by the Superior Court of the County of Los Angeles, State of California, under the date of July 28, 1969, Case Number: 950176; that the notice, of which the annexed is a printed copy, has been published in each regular and not in any supplement thereof on the following dates, to-wit:

MARCH 19

all in the year 20 15

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

Dated at Los Angeles, California, this

19 day of MARCH, 20 15

Rosa Berumen  
Signature

This space is for the County Clerk's filing Stamp

Proof of publication:

(808) 626-7464

**AVISO DE INTENCIÓN DE ADOPTAR UNA DECLARACIÓN NEGATIVA MITIGADA**  
19 de marzo de 2015  
Secretario de la Ciudad ##NG-15-122-AD

**Título del Proyecto:** Proyecto de Mejoras del Área de Seguridad de la Pista de Aterrizaje (RSA) Pista de Aterrizaje 6R-24L del Aeropuerto Internacional de Los Angeles (LAX)

**Ubicación del Proyecto:**  
El sitio del proyecto está ubicado en LAX, dentro de la ciudad de Los Angeles, una ciudad incorporada dentro del Condado de Los Angeles. Los componentes de RSA del Proyecto propuesto están ubicados en el norte del campo de aviación de LAX, del Área de la Terminal Central (CTA) hacia el sur; de Sepúlveda Blvd. al este; de Westchester Pkwy. y Lincoln Blvd. al norte; y de Pershing Dr. y Vista del Mar Blvd. al oeste. El área de espera/estacionamiento de taxis sería reubicado a un estacionamiento existente ubicado en la propiedad de LAX, limitado generalmente por West 96th St., Vicksburg Ave., y West 98th St.

**Agencia Líder:** Aeropuertos Mundiales de Los Angeles (LAWA, por sus siglas en inglés)

**Descripción del Proyecto:**  
La intención del Proyecto propuesto es para cumplir con la Ley de Asignaciones de Agencias Independientes de 2006 de Transporte, Tesorería, Vivienda y Desarrollo Urbano, el Judicial, Distrito de Columbia y (Ley Pública [P.L.] 109-115), 30 de noviembre del 2005. P.L. 109-115 requiere la realización de las mejoras de RSA por patrocinadores de aeropuertos que posean un certificado bajo el Título 14, Código de Regulaciones Federales (CFR, por sus siglas en inglés), Parte 139, Certificación y Operaciones: Aeropuertos que Prestan Servicios a Determinadas Compañías Aéreas, tales como LAX, para cumplir con los estándares de diseño de aeropuerto de la Administración Federal de Aviación (FAA, por sus siglas en inglés) para el 31 de diciembre de 2005. LAWA preparó un Estudio de Viabilidad RSA y concluyó que el RSA existente para la Pista de Aterrizaje 6R-24L no cumple los estándares de diseño de aeropuertos de FAA y las mejoras a la RSA eran necesarias. Elementos del Proyecto propuesto pueden ser encontrados en línea visitando [www.ourlax.org](http://www.ourlax.org).

**Relación del Proyecto con la Evaluación Ambiental Borrador (DEA, Por sus siglas en inglés):**  
LAWA publicó un DEA sobre este mismo proyecto el 12 de marzo del 2015. LAWA está obligado a evaluar y divulgar los efectos ambientales potenciales del proyecto tanto bajo la Ley Nacional de Política Ambiental (NEPA) y la Ley de Calidad Ambiental de California (CEQA). Debido a las complejidades u diferencias entre las dos Leyes, documentos separados han sido preparados. Comentarios en ambos documentos pueden ser sometidos hasta el 24 de abril de 2015.

**Cómo Comentar sobre el Aviso de Intención de Adoptar una Declaración Negativa Mitigada**  
Comenzando el 19 de marzo del 2015, la Declaración Negativa Mitigada propuesta y el Anteproyecto de Estudio Inicial estarán disponibles para revisión pública a través del sitio web de LAWA en <http://www.ourlax.org> bajo "Proyectos Actuales" y en las siguientes ubicaciones hasta el 24 de abril del 2015: 1) Oficinas Administrativas de LAWA -One World Way #218, Los Angeles, CA 90045; 2) Sucursal de la Biblioteca de Westchester-Loyola Village -7114 W. Manchester Ave., Los Angeles, CA 90045; 3) Sucursal de la Biblioteca de Playa Vista -6400 Playa Vista Dr., Los Angeles, CA 90094; 4) Biblioteca de Inglewood -101 W. Manchester Blvd., Inglewood, CA 90301; y 5) Biblioteca de El Segundo -111 W. Mariposa Ave., El Segundo, CA 90245.

## Appendix B

### Comments on the Draft Initial Study/Proposed Mitigated Negative Declaration







# South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178

(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

SENT VIA E-MAIL AND USPS:

April 23, 2015

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

Ms. Evelyn Y. Quintanilla  
Los Angeles World Airports  
Capital Programming and Planning  
One World Way, Suite 218  
Los Angeles, CA 90045

**Draft Environmental Assessment (Draft EA) and Draft Initial Study/Mitigated  
Negative Declaration (Draft IS/MND) for the Proposed Los Angeles International  
Airport (LAX) Runway 6R-24L Runway Safety Area (RSA) Improvements Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final CEQA document.

In the project description, the Lead Agency proposes to make improvements to Runway 6R-24L at LAX. These improvements are intended to improve safety and to comply with airport design standards as promulgated by the Federal Aviation Administration (FAA). Construction is expected to begin in late 2015 and be completed by the end of 2016.

Project emissions were estimated in the Draft EA/Draft IS/MND using the FAA required Emissions and Dispersion Modeling System (EDMS) to estimate on-airport aircraft emissions. The SCAQMD staff has concerns about the project modeling analysis and permitting requirements for portable equipment operating during construction. The SCAQMD staff recommends that all the modeling be updated to ensure that there are no significant impacts. Further details concerning the modeling based on SCAQMD staff comments and permitting are included in the attachment.

Please provide the SCAQMD with written responses to all comments contained herein prior to the adoption of the Final NEPA/CEQA document. The SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Gordon Mize, Air Quality Specialist – CEQA Section, at (909) 396-3302, if you have any questions regarding these comments.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

Attachment

JW:JC:GM

LAC150313-01 Draft EA

LAC150320-01 Draft IS/MND

Control Numbers



**Air Quality Analysis - Dispersion Modeling**

1. In the Draft EA/Draft IS/MND, the Lead Agency determined that construction and operational impacts are less than significant. The SCAQMD staff recommends the following comments be incorporated in the air quality modeling, as applicable and that the modeling be updated in order to demonstrate that project air quality impacts are less than significant.
  - a) In the AERMOD modeling, the Lead Agency used meteorological data from LAX as on-site data. In the AERMET file, the Lead Agency used an anemometer height of 38.4 meters, while the ASOS website indicates that the anemometer height for LAX should be 33 feet. Additionally, when processing meteorological data with AERMET for AERMOD applications, EPA suggests that a threshold wind speed of 0.5 m/s be used. SCAQMD staff therefore recommends the Lead Agency revise the AERMET analysis using the correct anemometer height and threshold wind speed.
  - b) In the AERMOD modeling, the Lead Agency only included fenceline receptors along the project property boundary and did not include a receptor grid. In order to ensure that the maximum impacts from the project have been identified, SCAQMD staff recommends the Lead Agency include a receptor grid of no more than 100 meters spacing, extended out from the fenceline to a distance that demonstrates that the project's maximum impacts are accurately captured.
  - c) The Lead Agency used EDMS to assign elevations of the sources and receptors in the AERMOD dispersion modeling. While it is acceptable to use EDMS to assign the elevations of the various airport sources (such as take-off and landing of aircraft), SCAQMD staff recommends that the Lead Agency use AERMAP to assign the elevations of the receptors used in the AERMOD modeling.
  - d) In the AERMOD input files, a custom coordinate system was used due to limitations in EDMS. The coordinates are in the UTM system but the Y-coordinate had 3,000,000 meters subtracted from it. In order to ensure that the elevations for each receptor are assigned correctly, SCAQMD staff recommends that for AERMOD modeling, the Lead Agency convert all UTM coordinates back by adding 3,000,000 meters to the Y-coordinate and run AERMAP to assign the elevations.
  - e) In the AERMOD input file, an hourly emission file was used with the sources. However, the Air Quality analysis did not include a description of the hourly emission profile and this file was not included in the electronic files provided to SCAQMD staff for review. Therefore, SCAQMD staff recommends the Lead Agency include a description of the hourly emission profiles used and then submit the electronic files when responding to SCAQMD staff comments for review.

**Permitting Requirements for Portable Equipment**

2. Based on the project description, the Lead Agency's construction equipment list includes portable generators, air compressors, and aggregate crushing/screen equipment. The Lead Agency is reminded that this portable equipment would require

a SCAQMD permit under SCAQMD Rule 203(a) if operated anywhere at the airport after a one year period. Should the Lead Agency have any permit related questions concerning this equipment, SCAQMD Engineering and Compliance staff can be contacted at (909) 396-2718.



508	Edward G Keating	<a href="mailto:edward.g.keating@stanfordalumni.org">edward.g.keating@stanfordalumni.org</a>	8707 Falmouth Avenue	Playa del Rey	CA 90293	Runway 6R-24L RSA (NEPA)	As both a neighbor and user of Los Angeles International Airport, I would like to emphasize the pre-eminent importance of the safety of airport operations. In that vein, it surprises me that the draft environmental assessment for the Runway 6R-24L RSA makes no allusion, as far as I can tell, to the February 2, 1991 runway incursion crash at LAX between USAir flight 1493 and SkyWest Airlines flight 5569. That crash, as you know, killed 35 individuals, as well as destroying both aircraft. While the direct causes of that accident have, fortunately, already been addressed, that tragedy reminds us of the importance of runway issues at LAX. It seems to me, therefore, that a very strong presumption should be made in favor of projects of this sort that will yet-further increase the safety of operations at LAX.	3/16/2015
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1           The purpose of today's hearing is to receive  
2 public comments on the Draft Environmental Assessment in  
3 accordance with the National Environmental Policy Act and  
4 Federal Aviation Administration policies and procedures.

5           Mr. Culberson, as you just heard, just gave us  
6 the presentation and I will be calling speakers.

7           So far we have one speaker. When I call your  
8 name, please come to the microphone right here and state  
9 and spell your name for the court reporter right here  
10 (indicating) and then proceed with your comments.

11           If you have -- if anybody else wishes to make a  
12 comment, please make sure that you fill out a speaker  
13 card form in the front.

14           So we'll call the first speaker. It is Michael  
15 Parris.

16           MR. PARRIS: I need more than three minutes. He  
17 talked a half hour, you know.

18           I've been a resident at 9608 Aviation Boulevard  
19 since 1958. I raised my family there. I sent them to  
20 school there. It's bounded by La Cienega, Aviation,  
21 Arbor Vitae and Century.

22           They have devastated our area all the way down  
23 from where we are, the airport, all the way down to  
24 El Segundo. Now they're going to finish the job and do  
25 the more affluent areas of Ladera Heights, Playa del Rey,

1 Kentwood, Westborough Heights. And the conclusion to  
2 that was we sued the airport and we won, and very few  
3 people know about it. They never put it in the paper or  
4 anything, actually.

5 It went from seven years and we filed -- our  
6 lawyer filed an appeal because the offer was too low and  
7 the whole problem was the noise factor and they said,  
8 Well, from now on, we'll fly over the ocean. We'll start  
9 on the ocean and fly over the ocean and come in from the  
10 ocean. And everything's been beautiful for quite a few  
11 years.

12 Now all of a sudden they give me that safety  
13 factor, the FAA and the GAA and all these AA jobs. I  
14 mean, let's face it. I think what the people should do  
15 is get another lawyer like we had before and sue the  
16 airport again and show them that we live here. We don't  
17 care about two or three people's safety. If they think  
18 it's such a good deal, put it in their area, just like  
19 Santa Monica's fighting this thing down to the bone now,  
20 actually.

21 I think that the people are out of line. I  
22 think you made a deal to fly over the ocean, come in out  
23 over the ocean. Everything's been fine. All of a  
24 sudden, now you've got to increase the east runways.  
25 Actually, that allows bigger jets to fly in. And

1 eventually they'll say, Well, we changed our mind. We  
2 thought it was that way to begin with now, but now we  
3 have to do it another way.

4 It's just a lot of conversation and I would  
5 suggest that the people that live in these areas get a  
6 good lawyer and fight the City as much as they can. I'll  
7 put up a few bucks. I don't know if the rest want to do  
8 it, actually, and tell them that we're sick and tired of  
9 this pushing and shoving. And if you think it's so good,  
10 put it in your area.

11 That's my comments.

12 MS. QUINTANILLA: Thank you.

13 Do we have any other speakers? Okay. Since  
14 nobody else has signed up to speak, I would like to  
15 recess the public hearing until another speaker comes  
16 forward.

17 So if anybody else wants to make a comment,  
18 please fill out another card, or if you want to continue  
19 with your comments, please fill out another card. If  
20 not, we'll be in recess until another speaker comes  
21 forward. Thank you.

22 (Recess)

23 MS. QUINTANILLA: We have one more speaker,  
24 Mr. Michael Parris.

25 MR. PARRIS: I'd like to reiterate, actually, the

1 eventually they'll say, Well, we changed our mind. We  
2 thought it was that way to begin with now, but now we  
3 have to do it another way.

4           It's just a lot of conversation and I would  
5 suggest that the people that live in these areas get a  
6 good lawyer and fight the City as much as they can. I'll  
7 put up a few bucks. I don't know if the rest want to do  
8 it, actually, and tell them that we're sick and tired of  
9 this pushing and shoving. And if you think it's so good,  
10 put it in your area.

11           That's my comments.

12           MS. QUINTANILLA: Thank you.

13           Do we have any other speakers? Okay. Since  
14 nobody else has signed up to speak, I would like to  
15 recess the public hearing until another speaker comes  
16 forward.

17           So if anybody else wants to make a comment,  
18 please fill out another card, or if you want to continue  
19 with your comments, please fill out another card. If  
20 not, we'll be in recess until another speaker comes  
21 forward. Thank you.

22           (Recess)

23           MS. QUINTANILLA: We have one more speaker,

24           Mr. Michael Parris.

25           MR. PARRIS: I'd like to reiterate, actually, the

1 frustration that I felt over the years, actually,  
2 listening to all this hogwash all the time about my  
3 safety and this and that. And what the FAA said, I could  
4 give a damn, less, what they say, actually.

5 I am a World War II combat veteran. I served my  
6 country. I pay taxes, actually, and now all of a sudden  
7 we came to an agreement in the lawsuit to fly over the  
8 ocean and now all of a sudden, what are you doing? Now  
9 you want to increase the east runway. I've been hearing  
10 planes for three weeks now that I haven't heard for  
11 years, actually.

12 You keep changing your mind and changing your  
13 tune and I could care less about it. I figure we have  
14 some right on the ground, too. Never mind the people  
15 flying. The people on the ground have a few rights, too,  
16 actually, and they've destroyed every area and now  
17 they're going to finish the job.

18 You're going to ruin some real nice area, some  
19 influential areas; like I said, the marina and Ladera and  
20 Kentwood and Westborough Heights. They're going to  
21 finish the job, actually.

22 I think that -- I hope that the people get  
23 together. I'm surprised there isn't more people here --  
24 they're afraid to speak up -- there's more people here,  
25 but I tell you one thing. They'll learn their lesson

1 before it's all said and done. They'll wish they would  
2 have come up here and said a few words.

3 MS. QUINTANILLA: Thank you, Mr. Parris.

4 If there are no other speakers, we'll take  
5 another break.

6 (Recess)

7 MS. QUINTANILLA: It is now 7:00 p.m.

8 Written comments can either be deposited in one  
9 of the comment boxes located in this room, mailed to  
10 Los Angeles World Airports at the address printed at the  
11 bottom of the written comment form, or submitted online  
12 on the project website at [www.ourLAX.org](http://www.ourLAX.org) by 5:00 p.m. on  
13 April 24th, 2015. Thank you for attending tonight. This  
14 concludes the public hearing for the Draft Environmental  
15 Assessment for Los Angeles International Airport.

16 (Proceedings concluded at 7:00 p.m.)

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## **Appendix C**

### Mitigation Monitoring and Reporting Program





This document constitutes the Mitigation Monitoring and Reporting Program (MMRP) for the Runway 6R-24L Runway Safety Area (RSA) Improvements Project (Project). This MMRP specifies the monitoring and reporting requirements for the proposed Project, as related to implementation of applicable LAX Master Plan mitigation measures, applicable Bradley West Project (BWP)-specific mitigation measures (i.e., measures adopted in connection with approval of the Bradley West Project, which also pertain to, and have been considered within, the analysis completed for the proposed IS/MND), and Project-specific mitigation measures identified in the draft Initial Study and proposed Mitigated Negative Declaration (IS/MND). The LAX Master Plan commitments and measures, along with the BWP-specific measures identified below, are already being implemented consistent with the MMRPs adopted for the LAX Master Plan and BWP, and will be incorporated as part of the proposed Project.

This MMRP provides the number and title of each applicable LAX Master Plan commitment, LAX Master Plan mitigation measure, BWP-specific mitigation measure, and Project-specific mitigation measure, and the timing of implementation, monitoring frequency, and actions indicating compliance. The MMRP identifies each commitment and measure by the environmental discipline of the measure. **Table 1** below lists the Project-specific mitigation measures; **Table 2** lists the applicable BWP-specific mitigation measures; and **Table 3** lists the applicable LAX Master Plan Mitigation Measures.

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**Table 1: Project Specific Mitigation Measures**

MITIGATION MEASURES		IMPACT BEING ADDRESSED	TIMING OF IMPLEMENTATION	MONITORING FREQUENCY	ACTIONS INDICATING COMPLIANCE
<b>Air Quality and Human Health</b>					
<b>MM-AQ (6R24L)-1</b>	<ul style="list-style-type: none"> <li>2n: On-road trucks used on LAX construction projects with a gross vehicle weight rating of at least 14,001 pounds shall, at a minimum, comply with USEPA 2010 on-road emissions standards for PM<sub>10</sub> and NO<sub>x</sub>. Contractor requirements to utilize such on-road haul trucks or the next cleanest vehicle available will be subject to the provisions of LAWA Air Quality Control Measure 2p below.</li> <li>2o: After December 31, 2014, all off-road diesel-power construction equipment greater than 50 horsepower shall meet USEPA Tier 4(final) off-road emissions standards. Tier 4(final) equipment shall be considered based on availability at the time the construction bid is issued. Contractor requirements to utilize Tier 4(final) equipment or the next cleanest equipment available will be subject to the provisions of LAWA Air Quality Control Measure 2p below. LAWA will encourage construction contractors to apply for SCAQMD "SOON" funds to accelerate clean-up of off-road diesel engine emissions.</li> <li>2p: The on-road haul truck and off-road construction equipment requirements set forth in Air Quality Control Measures 2n and 2o above shall apply unless any of the following circumstances exist and the Contractor provides a written finding consistent with project contract requirements that: <ul style="list-style-type: none"> <li>The Contractor does not have the required types of on-road haul trucks or off-road construction equipment within its current available inventory and intends to meet the requirements of the Measures 2n and 2o as to a particular vehicle or piece of equipment by leasing or short-term rental, and the Contractor has attempted in good faith and due diligence to lease the vehicle or</li> </ul> </li> </ul>	Construction-related air pollutant emissions	Included as condition of grading or demolition contracts	Once prior to commencement of construction	Completion of implementation plan



MITIGATION MEASURES	IMPACT BEING ADDRESSED	TIMING OF IMPLEMENTATION	MONITORING FREQUENCY	ACTIONS INDICATING COMPLIANCE
<p>equipment that would comply with these measures, but that vehicle or equipment is not available for lease or short-term rental within 120 miles of the project site, and the Contractor has submitted documentation to LAWA showing that the requirements of this exception provision (Measure 2p) apply.</p> <ul style="list-style-type: none"> <li>- The Contractor has been awarded funding by SCAQMD or another agency that would provide some or all of the cost to retrofit, repower, or purchase a piece of equipment or vehicle, but the funding has not yet been provided due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and due diligence to lease or short-term rent the equipment or vehicle that would comply with Measures 2n and 2o, but that equipment or vehicle is not available for lease or short-term rental within 120 miles of the project site, and the Contractor has submitted documentation to LAWA showing that the requirements of this exception provision (Measure 2p) apply.</li> <li>- Contractor has ordered a piece of equipment or vehicle to be used on the construction project in compliance with Measures 2n and 2o at least 60 days before that equipment or vehicle is needed at the project site, but that equipment or vehicle has not yet arrived due to circumstances beyond the Contractor's control, and the Contractor has attempted in good faith and due diligence to lease or short-term rent a piece of equipment or vehicle to meet the requirements of Measures 2n and 2o, but that equipment or vehicle is not available for lease or short-term rental within 120 miles of the project, and the Contractor has submitted documentation to LAWA showing that the requirements of this exception provision (Measure 2p) apply.</li> <li>- Construction-related diesel equipment or vehicle</li> </ul>				

MITIGATION MEASURES	IMPACT BEING ADDRESSED	TIMING OF IMPLEMENTATION	MONITORING FREQUENCY	ACTIONS INDICATING COMPLIANCE
<p>will be used on the project site for fewer than 20 calendar days per calendar year. The Contractor shall not consecutively use different equipment or vehicles that perform the same or a substantially similar function in an attempt to use this exception (Measure 2p) to circumvent the intent of Measures 2n and 2o.</p> <ul style="list-style-type: none"> <li>- Documentation of good faith efforts and due diligence regarding the above exceptions shall include written record(s) of inquiries (i.e., phone log[s]) to at least three (3) leasing/rental companies that provide construction-related on-road trucks of the type specified in Measure 2n above (i.e., medium-duty and larger diesel-powered trucks with a gross vehicle weight rating of at least 14,001 pounds) or diesel-powered off-road construction equipment such as the types to be used by the Contractor or Subcontractor, documenting the availability/unavailability of the required types of trucks/equipment. LAWA will, from time-to-time, conduct independent research and verification of the availability of such vehicles and equipment for lease/rent within a 120 mile radius of LAX, which may be used in reviewing the acceptability of the Contractor's/Subcontractor's good faith efforts and due diligence.</li> <li>- In any of the situations described above, the Contractor shall provide the next cleanest piece of equipment or vehicle as provided by the step down schedules in <b>Table 1-A</b> for Off-Road Equipment and <b>Table 1-B</b> for On-Road Equipment.</li> </ul>				

MITIGATION MEASURES	IMPACT BEING ADDRESSED	TIMING OF IMPLEMENTATION	MONITORING FREQUENCY	ACTIONS INDICATING COMPLIANCE
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**Table 1-A: Off-Road Vehicle Compliance Step-Down Schedule**

COMPLIANCE ALTERNATIVE	ENGINE STANDARD	CARB-VERIFIED DECS (VDECS)
1	Tier 4 <i>interim</i>	N/A*
2	Tier 3	Level 3
3	Tier 2	Level 3
4	Tier 1	Level 3
5	Tier 2	Level 2
6	Tier 2	Level 1
7	Tier 3	Uncontrolled
8	Tier 2	Uncontrolled
9	Tier 1	Level 2

NOTES:

Equipment less than Tier 1, Level 2 shall not be permitted.

\* Tier 4 (interim or final) or 2007 model year equipment not already supplied with a factory-equipped diesel particulate filter shall be outfitted with Level 3 VDECS.

SOURCE: CDM Smith, January 2014.

PREPARED BY: Ricondo & Associates, Inc., April 2015.

MITIGATION MEASURES			IMPACT BEING ADDRESSED	TIMING OF IMPLEMENTATION	MONITORING FREQUENCY	ACTIONS INDICATING COMPLIANCE
Table 1-B: On-Road Vehicle Compliance Step-Down Schedule						
COMPLIANCE ALTERNATIVE	ENGINE STANDARD	CARB-VERIFIED DECS (VDECS)				
1	2007	N/A*				
2	2004	Level 3				
3	1998	Level 3				
4	2004	Uncontrolled				
5	1998	Uncontrolled				
NOTES:						
Equipment with a model year earlier than model year 1998 shall not be permitted.						
* Tier 4 (interim or final) or 2007 model year equipment not already supplied with a factory-equipped diesel particulate filter shall be outfitted with Level 3 VDECS.						
Nothing in the above measures shall require an emissions control device (i.e., VDECS) that does not meet OSHA standards.						
SOURCE: CDM Smith, January 2014.						
PREPARED BY: Ricondo & Associates, Inc., April 2015.						
			Biological Resources			
MM-BC (6R24L)-1	Conservation of Sensitive Habitat. Mitigation for the permanent loss of state-designated sensitive habitat within the Los Angeles Airport/El Segundo Dunes shall be replaced at a ratio of 2:1 within the Los Angeles Airport/El Segundo Dunes as described in the Los Angeles Airport/El Segundo Dunes Habitat Restoration Plan. In addition, mitigation for the temporary loss of state-designated sensitive habitat shall include the restoration of the area to		Temporary construction impacts to sensitive areas and degradation of state-designated sensitive habitats	Preconstruction/ Construction	Once, upon completion of pre-construction evaluation and then on-going during construction if within 100 feet of the Habitat Restoration Area; Annually during	Completion of pre-construction evaluation and presence of environmental monitor when construction is within 100 feet of
Monitoring Agency: LAWA						

	MITIGATION MEASURES	IMPACT BEING ADDRESSED	TIMING OF IMPLEMENTATION	MONITORING FREQUENCY	ACTIONS INDICATING COMPLIANCE
	the appropriate coastal dune plant community consistent with the intent and procedures described in the Los Angeles/El Segundo Dunes Habitat Restoration Plan. The replacement and restoration of state-designated sensitive habitat shall be undertaken through restoration procedures as described in the Los Angeles Airport/El Segundo Dunes Habitat Restoration Plan.			operation and maintenance	state-designated sensitive habitat; Periodic Monitoring Report
		<b>Cultural Resources</b>			
<b>MM-HA (6R24L)-1</b>  <b>Monitoring Agency: LAWA</b>	Conformance with LAX Master Plan Archaeological Treatment Plan: As defined in the LAX Master Plan MMRP Archaeological Treatment Plan (ATP), areas are not subject to archaeological monitoring if they contain re-deposited fill or have previously been disturbed. LAWA shall retain a qualified archaeologist (an archaeologist who satisfies the Secretary of the Interior's Professional Qualifications Standards [36 CFR 61]) to monitor excavation activities in native or virgin soils in accordance with the detailed monitoring procedures and other procedures outlined in the ATP regarding treatment for archaeological resources that are accidentally encountered during construction. The extent and frequency of inspection shall be defined based on consultation with the archaeologist. Following initial inspection of excavation materials, the archaeologist may adjust inspection protocols as work proceeds. Identification, evaluation, and recovery of cultural resources shall be conducted in accordance with the methods, guidelines, and measures established in the ATP. If Native American cultural resources are encountered, LAWA shall comply with guidance established in the ATP for retaining a Native American monitor. If human remains are found, LAWA shall comply with the State Health and Safety Code regarding the appropriate treatment of those remains as outlined in the ATP. Reporting shall be completed in conformance with the requirements established in the ATP to document the archaeological monitoring effort and guidance as to the proper curation and archiving of artifacts in accordance with industry and federal standards.	Loss or destruction of important archaeological resources	Prior to commencement of construction in native or virgin soils or upon discovery of potential archaeological resources	On-going during excavation and grading activities, as identified in ATP	Filing of appropriate reports (i.e. excavation/recovery report) with LAWA by project archaeologist pursuant to ATP. If no resources are found, a report indicating as much should be filed

	MITIGATION MEASURES	IMPACT BEING ADDRESSED	TIMING OF IMPLEMENTATION	MONITORING FREQUENCY	ACTIONS INDICATING COMPLIANCE
<b>MM-HA (6R24L)-2</b>  <b>Monitoring Agency: LAWA</b>	Archaeological Resource Construction Personnel Briefing: If excavation activities will occur in native or virgin soils, construction personnel will be briefed by the consulting archaeologist in the identification of archaeological resources and in the correct procedures for notifying the relevant individuals should such a discovery occur.	Loss or destruction of important archaeological resources	Prior to commencement of construction in native or virgin soils	As required by arrival of new personnel	Contractor certification; signatures of orientation attendees; status updates in annual LAX MMRP progress report.
<b>MM-PA (6R24L)-1</b>  <b>Monitoring Agency: LAWA</b>	Conformance with LAX Master Plan Paleontological Management Treatment Plan: As defined in the Final LAX Master Plan MMRP Paleontological Management Treatment Plan (PMTP), areas are not subject to paleontological monitoring if they contain re-deposited fill or have previously been disturbed. If the project site is determined to exhibit a high potential for subsurface resources, paleontological monitoring will be conducted in accordance with the procedures stipulated in the PMTP. If the project site is determined to exhibit a low potential for subsurface deposits, excavation need not be monitored as per the PMTP. In the event that paleontological resources are discovered, the procedures outlined in the PMTP for the identification of resources will be followed.	Loss or destruction of important paleontological resources	Prior to issuance of any excavation and grading permits	Once, upon retention of paleontologist and approval of the PMTP	Retention of paleontologist and approval of the PMTP by LAWA
<b>MM-PA (6R24L)-2</b>  <b>Monitoring Agency: LAWA</b>	Construction Personnel Briefing: If excavation activities will occur in native or virgin soils, construction personnel will be briefed by the consulting paleontologist in the identification of fossils or fossiliferous deposits and in the correct procedures for notifying the relevant individuals should such a discovery occur, in accordance with the PMTP.	Loss or destruction of important paleontological resources	Prior to commencement of construction in native or virgin soils	As required by arrival of new personnel	Contractor certification; signatures of orientation attendees; status updates in annual LAX MMRP progress report.



Table 2: Bradley West Mitigation Measure

MITIGATION MEASURES		IMPACT BEING ADDRESSED	TIMING OF IMPLEMENTATION	MONITORING FREQUENCY	ACTIONS INDICATING COMPLIANCE
<b>Biological Resources</b>					
<b>MM-BC (BWP)-8</b>	Conservation of Faunal Resources: Nesting Birds/Raptors. To comply with the Migratory Bird Treaty Act, for those areas of the project site that are not actively maintained and have a potential for nesting birds/raptors, if construction is scheduled to occur during the nesting season for birds/raptors (generally February 1 to June 30 for raptors and March 15 to August 15 for nesting birds), vegetation that will be impacted by the proposed project shall be removed outside the nesting season if feasible. If this is not feasible, then a qualified biologist shall inspect the shrubs/trees prior to project activities to ensure that no nesting birds/raptors are present. If the biologist finds an active nest within the construction area and determines that the nest may be impacted, the biologist will delineate an appropriate buffer zone; the size of the buffer zone will depend on the species and the type of construction activity, and will be determined in consultation with CDFW. Only construction activities (if any) that have been approved by a Biological Monitor will take place within the buffer zone until the nest is vacated. The biologist shall serve as a construction monitor during those periods when construction activities shall occur near active nest areas to ensure that no inadvertent impacts on these nests shall occur. These construction avoidance measures will be coordinated with LAWA's USDA Wildlife Hazard Biologist and will be consistent with FAA Advisory Circular No. 150/5200-33 "Hazardous Wildlife Attractants on or Near Airports" and LAWA's "LAX Wildlife Hazard Mitigation Plan" to avoid increasing wildlife hazards to aircraft.	Potential loss of nesting birds/raptors subject to the Migratory Bird Treaty Act	If construction occurs between February 1 and August 15, removal of vegetation outside the nesting season, if feasible. If not feasible, pre-construction surveys.	If active nests are present and may be impacted, a Biological Monitor shall be present during those periods when construction activities will occur near active nest areas.	If required, establishment of buffer zones and construction avoidance measures between February 1 and August 15.

**Table 3: LAX Master Plan Mitigation Measure**

MITIGATION MEASURES		IMPACT BEING ADDRESSED	TIMING OF IMPLEMENTATION	MONITORING FREQUENCY	ACTIONS INDICATING COMPLIANCE
<b>Biological Resources</b>					
<b>MM-BC-2</b>  <b>Monitoring Agency: LAWA</b>	Conservation of Floral Resources: Lewis' Evening Primrose and South Coast Branching Phacelia. LAWA or its designee would prepare and implement a plan to compensate for the loss of individuals of the Lewis' evening primrose and south coast branching phacelia in coordination with the appropriate resource agencies. LAWA or its designee shall collect seed from those plants to be removed, and properly clean and store the collected seed until used. A mitigation site of suitable habitat equal to the area of impact would be delineated within areas of the Los Angeles Airport/El Segundo Dunes or equivalent. Collected seed shall be broadcast (distributed) after the first wetting rain following or concurrent with the associated impact, preferentially in the fall or early winter. LAWA or its designee shall implement a monitoring plan to monitor the establishment of individuals of Lewis' evening primrose and south coast branching phacelia for a period of not more than 5 years. Performance criteria shall include the establishment of an equal number of plants as that impacted following the distribution of seed within the mitigation site. Performance criteria would also include confirmation of recruitment for 2 years following the first year that flowering is observed and establishment of individuals throughout the mitigation area within 3 years following the first year that flowering is observed.	Potential loss of Lewis' evening primrose individuals that would result in a substantial adverse effect or substantial net reduction in population	Prior to any work activities, pre-construction focused surveys during the period of March through May to determine the presence or absence of Lewis' evening primrose. If it is determined that a substantial net reduction in population would occur, preparation of a special status plant mitigation program prior to initiation of construction of the proposed Project.	If required, as per special status plant mitigation program for Lewis' evening primrose; Regular site visits (e.g., quarterly, annually) for no more than 5 years or until germination, flowering and seed set of at least an equal number of plants impacted	If required, preparation of special status plant mitigation program; periodic monitoring report

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