Appendix B

Agency Coordination

OFFICE OF HISTORIC PRESERVATION
DEPARTMENT OF PARKS AND RECREATION
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August 4, 2014

FAA_2014_0716_001

David B. Kessler
Regional Environmental Protection Specialist
Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 900009-2007

RE: Proposed Improvements, Runway 6R-24L Runway Safety Area, Los Angeles International Airport, Los Angeles

Dear Mr. Kessler:

Thank you for consulting with me. You do on behalf of the Federal Aviation Administration (FAA) in an effort to comply with 36 CFR Part 800 of the National Historic Preservation Act of 1966, as amended. You are requesting my comments on this undertaking's Area of Potential Effects (APE).

The City of Los Angeles, through its Aviation Department of Los Angeles World Airports and the FAA, proposes to implement various improvements to the Runway Safety Area (RSA) for Runway 6R-24L. You define the APE as the area of direct disturbance for the construction of the RSA and potential staging areas, as depicted on the map included with your documentation. The APE is located within the boundaries of Los Angeles International Airport. The depth of ground disturbance required to build the RSA and associated infrastructure will reach depths of three-to-four feet below surface level.

In addition to your letter, you have provided map depicting the APE.

Having reviewed your submittal, I have no objections to your delineation of the APE. Please bear in mind that in the event the scale or scope of the project is changed, you may have additional responsibilities under 36 CFR Part 800.

Thank you for seeking my comments and considering historic properties as part of your project planning process. I look forward to further consultation with you. If you have any questions or concerns, please contact Tristan Tozer of my staff at (916) 445-7027 or at email at Tristan.Tozer@parks.ca.gov.

Sincerely,

Carol Roland-Nawi, Ph.D.

Carol Roland-Nawi, Ph.D.
State Historic Preservation Officer

U.S Department
of Transportation
**Federal Aviation
Administration**

Western-Pacific Region
Airports Division

Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 90009-2007

January 23, 2015

Dr. Carol Roland-Nawi
State of California
State Historic Preservation Officer
Office of Historic Preservation
1725 23rd Street, Suite 100
Sacramento, California 95816

Attention: Mr. Tristan Tozer

Dear Dr. Roland-Nawi:

**Proposed Improvements to the Runway 6R-24L
Runway Safety Area
Los Angeles International Airport
Los Angeles, Los Angeles County, California
Section 106 Coordination No.: FAA_2014_0716_001**

The City of Los Angeles, through its Airport Department – Los Angeles World Airports (LAWA) and the Federal Aviation Administration (FAA) are preparing federal environmental documentation for the proposed undertaking of improving the Runway Safety Areas (RSA) for Runways 6R-24L, the inboard runway on the north side of Los Angeles International Airport (LAX). The City of Los Angeles is proposing this project in order to comply with the *The Transportation, Treasury, Housing and Urban Development, the Judiciary, the District of Columbia, and Independent Agencies Appropriations Act, 2006* (Public Law 109-115). Public Law 109-115 requires RSAs to meet FAA design standards by December 31, 2015. This project is similar to the other RSA projects at the airport that we consulted on previously. We also previously consulted on minor improvements to the RSA for Runway 6R-24L. This consultation effort addresses proposed improvements that would bring the RSA for Runway 6R-24L into compliance with FAA design standards.

Your office previously concurred with FAA's Area of Potential Effects (APE) for the proposed undertaking for Runway 6R-24L by letter dated August 4, 2014. A drawing depicting the APE is shown on **Figure 2.4-1** in the enclosed copy of the *Proposed Runway 6R-24L Safety Area - Cultural Resources Technical Report,* dated December 15, 2014.

FAA is providing the following background information to assist you in reviewing FAA's determinations of eligibility and findings of effect related to the proposed undertaking.

1. Background Information.

RSA's are clear areas around a runway, free of objects and structures. The airport sponsor designs and maintains the RSA to enhance safety if an aircraft undershoots, overruns, or veers off the runway, and to provide greater accessibility for aircraft rescue and firefighting equipment during such incidents. Paragraph 2 of FAA Advisory Circular 150/5300-13A, *Airport Design*, defines an RSA as "*a defined surface around the runway prepared or suitable for reducing the risk of damage to airplanes in the event of an undershoot, overshoot or an excursion form the runway.*" FAA Order 5200.8, *Runway Safety Area Program*, provides the applicable FAA requirements for an RSA.

In order for airports across the country to meet FAA airports standards, federal legislation entitled, *The Transportation, Treasury, Housing and Urban Development, the Judiciary, The District of Columbia, and Independent Agencies Appropriations Act, 2006* (Public Law 109-115) was passed requiring RSAs at airports that accommodate scheduled air carriers to meet FAA design standards by December 31, 2015. The legislation requires airports to meet the RSA standards by the specified deadline to the maximum extent practicable.

An engineering analysis of each of the runways at LAX determined it is not practicable to create a traditional graded and compacted 1000-foot long by 500 foot wide RSA for Runway 6R-24L that meets the applicable FAA Airport Design Standards. The RSA for Runway 6R-24L is constrained to the east by existing navigational equipment and on the west by Pershing Drive.

LAWA proposes to shift the east end of the runway and the associated parallel and connecting taxiway system to the east about 800 feet, making the end a displaced threshold for departures to the west. The west end of the runway and the parallel and connecting taxiways will be shifted to the east about 420 feet. The proposed undertaking also includes relocation/ replacement of the federally owned and operated Approach Lighting System (ALS) for Runway 6R west of the runway, mostly in the Los Angeles/El Segundo Dunes between Pershing Drive and Vista del Mar.

The specific work for the ALS is to deactivate the last two westerly ALS stations and relocate the ALS about 400 feet to the east to accommodate the 420 foot easterly shift of the approach end of Runway 6R. Since the ALS is a federally owned and operated facility, FAA proposes to deactivate and remove the western most two ALS towers with sequenced flashing lights and associated support equipment located about 2,400 and 2,200 feet respectively, from the west end of the runway. FAA also proposes to relocate three closely spaced towers with steady burning lights that form the "1000-foot light bar" to a location just east of Pershing Drive. This new site is outside of the eastern boundary of the California Coastal Zone. The 1000-foot light bar must be located 1,000 feet from the runway threshold as required by FAA's ALS design criteria. The proposed project also includes replacement of the other ALS towers with new towers. The existing towers have reached the end of their useful life. There is a possibility that the existing concrete pads may be able to be re-used for the new equipment. However, FAA's Air Traffic Organization indicates that new concrete pads must be constructed to support the new

towers because the new equipment, while similar, is not identical to the existing equipment. We have included a photograph of both of these stations and the 1,000 foot light bar towers in Enclosure 2. Enclosure 3 shows the existing location of the various ALS stations, including those to be deactivated and removed and also shows the relocated ALS

The proposed undertaking also includes full demolition of a portion of the existing parallel and connecting taxiways at both ends of the runway. The runway and taxiways were originally built between 1958 and 1962. However, the pavement for both the runways and taxiways has been modified/repaired several times since it was built as a result of wear due to use. The shifting of the ends of the runway to create RSAs that meet FAA design standards requires this pavement to be removed. The pavement section is about 30 inches deep with the top 24 inches being Portland cement concrete. On the east end, the area east of the runway end is paved with a nominal 4-6 inch layer asphalt for jet blast protection.

FAA expects LAWA will remove the 24 inches of concrete, then grade and compact, as needed, the underlying soil to a depth of 3-4 feet below the bottom of the pavement. Following the completion of earthwork, LAWA will construct new taxiways immediately east of the ones that were removed and then repave those areas of the runway and taxiways to match the existing pavement.

LAWA intends to use four staging areas around the airport as shown on the APE drawing. Each of these sites has been significantly disturbed in the past.

2. Native American Consultation. FAA received a listing of Native American contacts for the proposed undertaking from the State of California Native American Heritage Commission for the RSA project on the south side of LAX. FAA used the same listing for Native American contacts for the RSA project on the north side of the airport. The commission recommended FAA contact the Los Angeles City/County Native American Indian Commission, The Ti'At Society/Inter-Tribal Council of Pimu, and six different representatives of the Gabrelino-Tongva Tribe.

On February 6, 2014, FAA provided detailed information about the proposed undertaking and APE for both Runways 6L-24R and 6R-24L to the tribal contacts provided by the California Native American Heritage Commission using the U.S. Mail and also by email to one of the Tribal contacts that did not have a physical mailing address. FAA provided response forms in stamped self-addressed envelopes.

FAA received only one email reply from one of the tribal contacts. The single reply was from John Tommy Rosas, Tribal Administrator/Tribal Litigator Tongva Ancestral Territorial Tribal Nation, stating he acknowledge receipt of the email, asked for hard copies of the attachments and would respond soon. Mr. Rosas did not provide a physical address to send the hard copies of the attachments. FAA did not receive any additional replies from Mr. Rosas. FAA did not receive any other comments.

For the specific proposed undertaking for the Runway 6R RSA, except for the extension of the APE into the LAX/El Segundo Dunes along the ALS, the APE mostly overlaps the APE for the RSA project for both runways 6L-24R and 6R-24L, in which FAA previously consulted with you in 2014. The area in the LAX/El Segundo Dunes where the ALS exists is highly disturbed due in part from the former Surfridge neighborhood that was demolished in the 1960s and early 1970s. The portion of the APE for Runway 6R includes the parallel taxiway immediately south of the runway. This area was disturbed to a depth of at least 3-4 feet for the construction of the taxiway pavements. Considering the fact that FAA did not receive any substantive comments from Native Americans on the RSA projects on either side of the airport for the RSA project and that the APE substantially overlaps the APE for Runway 6L-24R (the outboard runway), the FAA determined further consultation with Native American Tribes for the specific RSA project was not necessary.

3. National Register Eligibility Determinations. Sapphos Environmental, LAWA's environmental and cultural resources consultant, prepared the enclosed *Cultural Resources Technical Report*, dated December 15, 2014. Sapphos Environmental contacted the South Central Coastal Information Center at California State University - Fullerton, and used the 2005 Final Environmental Impact Statement/Environmental Impact Report for the LAX Master Plan and a variety of other resources. Table 5.1.2.1-1 identifies 17 other investigations within the study area of the proposed undertaking.

A total ten (10) previously recorded cultural resources were identified within the study area. Table 5.1.2.3-1 indicates there is only one structure that is eligibility for inclusion into the National Register of Historic Places (NRHP) – the Theme Building. The Loyola Theater was not evaluated because it is well outside the Direct Effects APE identified for the proposed undertaking.

Section 5.2 of the *Cultural Resources Technical Report* states that a Phase I survey identified no archaeological resources within the APE. The *Cultural Resources Technical Report* evaluated two historic-period resources: Runway 6R-24L and LAX Supplemental Site 1H. This site has a runway approach light in the center of the site along with structural debris from the former Surfridge neighborhood. Neither of the historic period resources meet the eligibility requirements for inclusion into the NRHP.

Based on the information contained within the *Cultural Resources Technical Report*, the FAA has determined there are no historic properties listed or eligible for listing on the NRHP within the APE for the proposed undertaking.

FAA seeks the California SHPO's concurrence with this determination.

4. Assessment of Adverse Effects on Historic Properties. Since the FAA has determined there are no historic properties listed or eligible for listing on the NRHP within the APE, the FAA finds the proposed undertaking will not affect any properties listed or eligible for listing on the NRHP under 36 Code of Federal Regulations Part 800.4(d)(1). **FAA seeks the California SHPO's concurrence with this finding.**

If you have any further questions about this matter, please call me at 310/725-3615.

Sincerely,

David B. Kessler, AICP
Regional Environmental Protection Specialist

Enclosure: (1) Cultural Resources Technical Report
(2) Photographs of Light Stations and the 1,000 Foot Light Bar Towers
(3) Diagram of Existing and future ALS Stations

Cc: LAX-600; E. Quintanilla – LAWA

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February 9, 2015

FAA_2014_0716_001

David B. Kessler
Regional Environmental Protection Specialist
Western-Pacific Airports Division
Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 90009-2007

RE: Proposed Improvements to the Runway 6R-24L Runway Safety Area, Los Angeles International Airport, Los Angeles, CA

Dear Mr. Kessler:

Thank you for consulting with me. You do so on behalf of the Federal Aviation Administration (FAA) in an effort to comply with 36 CFR Part 800 of the National Historic Preservation Act of 1966, as amended. You are requesting my concurrence with a finding of No Historic Properties Affected.

The City of Los Angeles, through its Aviation Department of Los Angeles World Airports and the FAA, proposes to implement various improvements to the Runway Safety Area (RSA) for Runway 6R-24L. The depth of ground disturbance required to build the RSA and associated infrastructure will reach depths of three-to-four feet below surface level.

In our previous round of consultation I commented that this project's Area of Potential Effects (APE) appeared adequate. Since this time the FAA has produced the following study as a part their identification efforts:

- *Los Angeles International Airport, Proposed Runway 6R-24L Runway Safety Area Improvements Project: Cultural Resources Technical Report* (Sapphos Environmental, Inc.: December 2014)

The report summarizes previous identification efforts undertaken at the airport, as well the results of current surveys. One built-environment resource, Runway 6R-24L, and one historic archaeological site, LAX Supplemental Site 1H, were documented in APE. Neither resource meets the eligibility requirements for listing on the National Register of Historic Places. No other structures or objects are sited in the APE.

Having reviewed your submittal, I have the following comments:

1) I concur with your Finding of Effect;

2) I concur that Runway 6R-24L and LAX Supplemental Site 1H are ineligible for listing on the NRHP under criterions A, B, C, or D at any level of significance.

3) Please be reminded that in the event of an inadvertent discovery or a change in the scale or scope of the undertaking, you may have additional responsibilities under 36 CFR Part 800.

Thank you for considering historic properties as a part of the project planning process. If you have any questions or comments, please contact Tristan Tozer of my staff at (916) 445-7027 or by email at Tristan.Tozer@parks.ca.gov.

Sincerely,

Carol Roland-Nawi, Ph. D.
State Historic Preservation Officer

U.S Department
of Transportation

**Federal Aviation
Administration**

Western-Pacific Region
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Federal Aviation Administration
P.O. Box 92007
Los Angeles, CA 90009-2007

January 16, 2015

Mr. Larry Simon
Federal Consistency Coordinator
California Coastal Commission
45 Freemont Street, Suite 2000
San Francisco, California 94105-2219

Dear Mr. Simon:

Los Angeles International Airport
Proposed Runway 6R-24L Safety Area Project
Request for Negative Determination

The Federal Aviation Administration (FAA), and the City of Los Angeles, through its Airport Department – Los Angeles World Airports (LAWA), are preparing an Environmental Assessment (EA) to address a proposal to improve the Runway Safety Area (RSA) for Runway 6R-24L, the inboard runway on the north side of Los Angeles International Airport (LAX). The EA is being prepared pursuant to the National Environmental Policy Act of 1969 (NEPA). The proposed Federal actions by the FAA are approval of the Airport Layout Plan, approval of further processing of an application for federal assistance for the proposed project and relocation/ replacement of the federally owned and operated Approach Lighting System (ALS) for Runway 6R within the California Coastal Zone at LAX. The work on the ALS equipment is a component of a larger RSA project that is on the airfield of the airport outside of the Coastal Zone. Since the bulk of the work for the RSA project is located outside the Coastal Zone, the FAA has determined this work would not affect any resources within the Coastal Zone. The focus of this letter is for work on federal facilities (the ALS) within the Coastal Zone.

In accordance with the Coastal Zone Management Act of 1972, as amended, Section 307(c)(1), the FAA has evaluated the proposed project and determined that it is consistent to the maximum extent practicable with the California Coastal Management Program. This Coastal Consistency Determination is in compliance with Title 15, Code of Federal Regulations, Section 930.34 et seq. The FAA seeks the California Coastal Commission's concurrence with our consistency determination.

Background:
LAWA proposes to implement various improvements to the RSA for Runway 6R-24L. *The Transportation, Treasury, Housing and Urban Development, The Judiciary, The District of Columbia, and Independent Agencies Appropriations Act, 2006* (Public Law 109-115) requires RSAs to meet FAA design standards by December 31, 2015.

Paragraph 102(qqq) of FAA Advisory Circular 150/5300-13A, *Airport Design,* defines Runway Safety Area as "*A defined surface surrounding the runway prepared or suitable for reducing the risk of damage to airplanes in the event of an undershoot, overshoot, or excursion from the runway."* FAA Order 5200.8, *Runway Safety Area Program,* provides the applicable FAA requirements for RSAs.

It is not practicable to create a traditional 1000 foot graded RSA for the west end of Runway 6R-24L that meets the applicable FAA Airport Design standards due to the proximity of Pershing Drive and the El Segundo blue butterfly Habitat preserve, west of the end of the runway. FAA Airport Design Standards require RSAs extend 1,000 feet beyond the ends of each runway.

Among the other work on the RSA for Runway 6R-24L, LAWA proposes to relocate the west end of Runway 6R about 420 feet east of its current location. The relocation of the runway end requires the FAA relocate a portion of its ALS towers. These towers are located about every 200 feet beginning from the end of the runway to about 2,500 feet west of the end of Runway 6R in the LAX/El Segundo Dunes.

The eastern boundary of the California Coastal Zone, in this area of LAX, is the eastern right-of-way boundary for Pershing Drive. Pershing Drive separates the airfield portion of the airport from the LAX/El Segundo Dunes.

Project Description:
The specific work that is the subject of this letter is to deactivate the last two ALS stations and relocate the ALS about 400 feet to the east to accommodate the 420 foot easterly shift of the approach end of Runway 6R. Specifically, FAA proposes to deactivate and remove the western most two ALS towers with sequenced flashing lights and associated support equipment located about 2,400 and 2,200 feet respectively, from the west end of the runway. FAA also proposes to relocate three closely spaced towers with steady burning lights that form the "1000-foot light bar" to a location just east of Pershing Drive. This new site is outside of the eastern boundary of the California Coastal Zone. The 1000-foot light bar must be located 1,000 feet from the runway threshold as required by FAA's ALS design criteria. The proposed project also includes replacement of the other ALS towers with new towers. The existing towers have reached the end of their useful life. There is a possibility that the existing concrete pads may be able to be re-used for the new equipment. However, FAA's Air Traffic Organization indicates that new concrete pads must be constructed to support the new towers because new equipment, while similar is not, identical to the existing equipment. We have included a photograph of both of these stations and the 1,000 foot light bar towers in Enclosure 1. Enclosure 2 shows the existing location of the various ALS stations, including those to be deactivated and removed and also shows the relocated ALS.

FAA proposes to abandon in-place, the existing concrete pads. Some minor excavation next to the concrete pads would be needed to disconnect the buried electrical and communications lines to each of these stations. The excavation would be to remove the existing concrete hand holes that are about 12-18 inches deep and then fill the voids with sand.

To accommodate the relocation of the ALS, FAA would need to install new power and communication cables. FAA proposes to accomplish this using directional boring equipment rather than trenching. The directional boring equipment would provide minimal surface disturbance between stations. The boring would be at depths of 3-6 feet below the soil surface. FAA would also excavate a small hole to reach the bore at each station to reconnect the stations to the power and communication cables.

Depending on the type of new ALS tower available, FAA may need to construct new concrete support pads. These pads are between 18-24 inches in depth and about 8-10 feet long and wide. The size of the pad depends on the height of the tower that it must support. An existing service roadway along the stations would be used by construction personnel to access each station.

FAA has also considered any effects on the federally listed El Segundo blue butterfly by the proposed shifting/replacement of the ALS in the Coastal Zone. Field surveys conducted in August 2014 have revealed that Coast Buckwheat – the host plant for the El Segundo blue butterfly are not present in the vicinity of the ALS towers. Coast Buckwheat is located about 300-500 feet south of the ALS service road south of an existing roadway that was part of the former Surf Ridge neighborhood that was removed in the early 1970s. FAA has determined the proposed project would not affect any federally listed species or designated critical habitat.

Staging and Access Areas.
Access to the various ALS stations will be by the existing gravel service road and the various paved roads in the dunes. Staging of equipment and parking of worker's vehicles would be accomplished using the existing paved roadways in the dunes near the ALS.

Total Area of Disturbance.
At each ALS station, the existing concrete pad can be as large as 10-foot by 10 foot for a total of 100 square feet per station. FAA estimates about 10 feet work space around the concrete pads would be needed for a total dimension of 30 feet by 30 feet. There are 10 ALS stations within the California Coastal Zone that would need to be disturbed, including the existing 1000-foot light bar on three closely spaced towers (see Enclosure 1). Thus FAA estimates a total of about 9,000 square feet (0.207 acres) of the dunes would be temporarily disturbed for the proposed project within the California Coastal Zone. Considering the easterly relocation of the ALS and that a total of seven towers would remain in the Coastal Zone, FAA estimates about 4,500 square feet (0.103 acres) would be permanently disturbed.

Project Schedule:
LAWA must complete the RSA work consistent with Public Law 109-115, not later than December 31, 2015. Given the significant complexity of the on-going work on all four runways at LAX, LAWA will comply with the law through the use of declared distances that will administratively shorten Runway 6R on the west end to meet FAA standards until the physical construction can be completed. LAWA will not close more than one runway at a time at LAX for operational use because the reduced airfield capacity would have a substantial adverse effect to the National Airspace System .

Since the bulk of the aircraft flights are to the west at LAX throughout the year, LAWA plans to work on the **east** end of the runway first. During construction work on Runway 6R-24L, the ALS, located in the dunes, will be deactivated because other navigational aids must be moved and will also be out of service during construction. Thus, FAA anticipates relocation of the ALS during the summer or fall of 2016 when LAWA anticipates beginning work on the west end of the runway.

Avoidance of Impacts

During construction, the FAA and LAWA will avoid and minimize impacts by implementing Best Management Practices and other general avoidance and minimization measures:

1. Soil disturbance will be minimized to the greatest extent practicable to reduce disturbance to native vegetation and to reduce the potential to introduce or spread invasive and non-native plant species. FAA notes that non-native ice-plant is located near many of the ALS stations for the Runway 6R end. Many of the plants in the dunes are showing signs of distress due to the drought.

2. Installation of new power and communication lines between the ALS stations will be accomplished using underground soil boring equipment instead of open trenching.

3. Access to each station will be via existing paved and gravel roads within the LAX/El Segundo Dunes from Pershing Drive.

Environmental Baseline

The deactivation of two ALS stations and replacement of the other stations with new ALS equipment are located within the LAX/El Segundo Dunes located between Pershing Drive on the east and Vista Del Mar on the west, which is west of the active airfield of LAX. The LAX/El Segundo Dunes contains the former Surf Ridge neighborhood that was demolished in the 1970s. Various ornamental and other non-native plants including palm trees are still present in the dunes.

The LAX/El Segundo Dunes also contains Coast Buckwheat (Eriogonum parvifolium) – the host plant for the federally listed El Segundo blue butterfly (*Euphilotes battoides allyni)*. The southern portion of the LAX/El Segundo Dunes are maintained by LAWA as the El Segundo blue butterfly habitat preserve. California Buckwheat (*Eriogonum fasciculatu)* is also present. El Segundo blue butterflies do not use California Buckwheat as a host plant. A field survey conducted with qualified biologists from Sapphos Environmental, of Pasadena, California, revealed there are no Coast Buckwheat plants along the ALS for Runway 6R. Coast Buckwheat was observed south of the unnamed road that provides access to the dunes from Pershing Drive south of Sandpiper Road. No Coast buckwheat was observed north of the unnamed road in the vicinity of the ALS stations. The unnamed road is located about 300-500 feet south of the ALS stations. During the field survey, six El Segundo blue butterflies were observed south of the unnamed road on the lee side of the dune. This is noteworthy as the field survey was near the end of the normal flight season for the butterflies.

As noted in the detail photographs on Enclosure 1 and the overall photos in Enclosure 2, ground cover by vegetation is not complete. Vegetation on the fore dune near the existing west end station of the ALS included ice plant – much of which was in distress or dead due to the long drought. There was no crust on the top of the sand, as was observed during periods of higher rainfall in the past.

LAWA has continued to move forward with enhancement of the LAX/El Segundo Dunes consistent with commitments LAWA made during the LAX Master Plan in 2004. One of those commitments was to begin to remove some of the paved roadways within the dunes to provide more habitat for the Coast Buckwheat. LAWA has removed several small streets in the northwest portion of the LAX/El Segundo Dunes. LAWA continues to grow Coast buckwheat in a nursery at the dunes for transplanting into areas cleared of ice plant and other non-native plant species.

Conclusion

After reviewing the environmental baseline, and considering the small number of square feet of potential disturbance by the deactivation of two ALS stations and replacement of equipment for the remaining ALS stations, FAA has determined the proposed project will not affect the marine environment, land resources, and other resources covered under the Coastal Zone Management Act. We base this determination on the utilization of the underground soil boring equipment to minimize surface disturbance, the location of the ALS stations are at least 300-500 feet north of Coast Buckwheat plants, the small amount of actual soil disturbance for the concrete support pads for the various ALS stations, and utilization of existing gravel and paved roadways to provide access to the ALS stations.

FAA has determined the temporary impacts of deactivation/replacement of the ALS equipment will not diminish the value of the coastal resources in the LAX/El Segundo Dunes. FAA has also determined the proposed project is consistent with the coastal resource protection policies of the California Coastal Management Program.

FAA seeks a Negative Determination from the California Coastal Commission for the proposed project. Please contact me at 310/725-3615, if you have any questions on this matter.

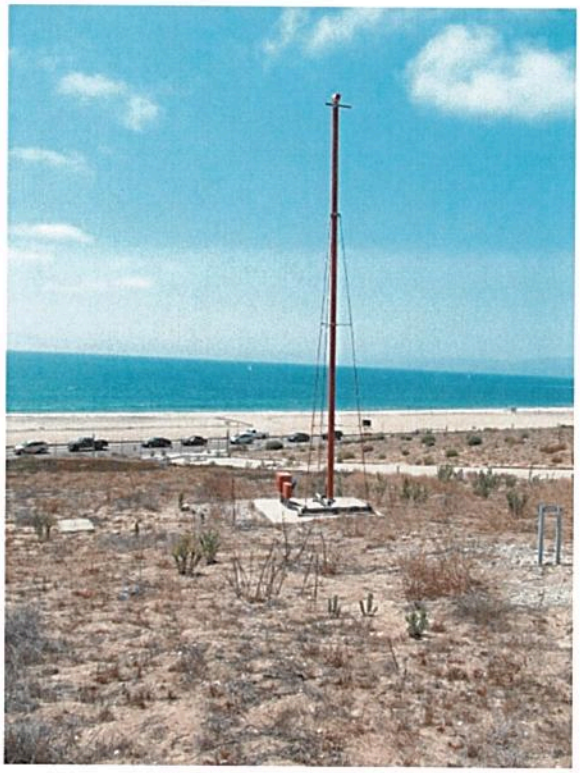
Sincerely,

David B. Kessler, AICP
Regional Environmental Protection Specialist

Enclosures

Cc: LAX-600

ENCLOSURE 1 – PHOTOGRAPHS OF APPROACH LIGHT STATIONS TO BE DEACTIVATED.



Approach Light Stations to be deactivated. Towers to be removed but concrete pads will remain.

1000 foot light bar with steady burning lights to be relocated to the east of Pershing Drive. Concrete pads to remain in place.

Table 1 – Approach Light Stations within California Coastal Zone for Runway 6R at LAX.

Station Identifier	Type of Station	Changes to occur	Result after shift/replacement	Photo of existing equipment.
8+00	Steady Burning 5-lights on a single tower. 9-foot by 8 foot and ½ inch concrete pad. Total 72.38 square feet (sf)	Tower replaced with new equipment, reuse-existing concrete pad	No change in concrete pad size	
10+00 (also described as the "1000 foot Light Bar")	Steady Burning 5-lights on 3 towers Each concrete pad is 9-feet by 8 feet (72 sf) each, plus control box foundation of 8.81 sf) total: 224.81 sf.	This station will be relocated east outside of California Coastal Zone, center pad to be reused, north and south pads to be removed	**Removal of approximately 144 sf of concrete.**	

12+00	Steady Burning 5-lights on a single tower, 9foot by 8-foot 10-inch concrete pad. Total <u>79.5 sf</u>	Re-use center concrete pad at existing Station 10+00	No change in concrete pad size	
14+00	Steady Burning 5-lights on five poles in one foundation 10 feet 10 ½ inches by 24 inches. Total <u>21.75 sf</u>	Existing 21.75 sf pad with five individual poles for steady burning lights to be removed and replaced with single a single flasher pole. Anticipate a 40-inch by 40-inch concrete pad (11.11 sf) plus control box foundation of 60 inches by 28 inches 11.67 sf. *See the example for Station 16+00 below.*	**Due to change from steady burning to flashing light, anticipate a total increase in concrete area by +1.03 sf due to need for control box foundation.**	

16+00	Single Pole flasher with control boxes. Pole foundation is 40-inches by 40 inches (11.11 sf) plus control box foundation 60 inches by 28 inches 11.67 sf Total 22.78 sf	Existing pad expected to be re-used	No change in concrete pad size	
18+00	Single Pole Flasher with Control Box. 8-inch diameter foundation for the Light Pole (.35 sf) plus 60-inch by 28 ½ inch (11.67 sf) foundation for control box Total 12.02 sf.	8-inch diameter concrete foundation to be replaced with similar size foundation for the pole and control box	No change in concrete pad size	

20+00	Single Pole Flasher with Control Box. 8-inch diameter foundation for the Light Pole (.35 sf) plus 60-inch by 28 ½ inch foundation (11.67 sf) for control box. Total 11.92 sf.	8-inch diameter concrete foundation to be replaced with similar size foundation for the pole and control box	No change in concrete pad size	
22+00	Single Pole Flasher with Control Box 36-inch diameter pole foundation (7.07 sf) plus control box foundation 60-inch by 28 ½ inch foundation (11.67) for control box. Total 22.74 sf.	36-inch diameter pole foundation and control box foundation to be removed	**Removal of 22.74 sf of concrete**	

24+00	Single Pole Flasher with Control Box and anchor pad. 10 feet 4-inches by 8 foot 3-inches (85.25sf), plus 12 inch by 29.5 inch anchor (2.45 sf) Total 87.7 sf	10' foot by 8 foot pad along with a 12-inch by 29 inch concrete anchor to be removed.	**Removal of 87.7 sf of concrete**	 
9 stations existing in California Coast Zone for Runway 6R today	Total existing square foot are: 555.6 SF.	7 ALS stations will remain in the California Coastal Zone	253.4 square feet would be removed. The result of the ALS shift/replacement would have about 302.2 sf of concrete in the Coastal Zone.	

STATE OF CALIFORNIA – NATURAL RESOURCES AGENCY EDMUND G. BROWN, JR., *GOVERNOR*

CALIFORNIA COASTAL COMMISSION

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Federal Aviation Administration
P.O. Box 92007
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Subject: Negative Determination ND-0003-15 (Relocation and Replacement of Approach Lighting System for Runway 6R at Los Angeles International Airport, Los Angeles County)

Dear Mr. Kessler:

The Coastal Commission staff has reviewed the above-referenced project. The Federal Aviation Administration (FAA) is improving the Runway Safety Area (RSA) for Runway 6R-24L, the inboard runway on the north side of Los Angeles International Airport (LAX). These RSA improvements and design standards are mandated by *The Transportation, Treasury, Housing and Urban Development, The Judiciary, The District of Columbia, and Independent Agencies Appropriations Act, 2006* (Public Law 109-115). The subject negative determination covers the relocation and replacement of those parts of the federally owned and operated Approach Lighting System (ALS) for Runway 6R (the runway designation for west-to-east approaches on Runway 6R-24L) which are located in the coastal zone within the El Segundo Dunes area of LAX. Other elements of the ALS relocation for Runway 6R and the other RSA improvements for Runway 6R-24L at LAX are located inland of the coastal zone and are not included in this negative determination.

In order to lengthen the Runway 6R RSA to meet FAA design standards, LAX is relocating the west end of Runway 6R approximately 420 feet east of its current location. It is not possible to extend the RSA westward from the west end of Runway 6R due to the immediate proximity of Pershing Drive at the west end of the runway and the El Segundo Blue Butterfly Habitat Preserve located immediately west of Pershing Drive.[1] Due to the eastward relocation of the runway endpoint, the FAA must relocate three of its Runway 6R ALS towers, which are located every 200 feet beginning from the end of the runway to a point approximately 2,500 feet west of the runway endpoint in the El Segundo Dunes.

The FAA proposes to deactivate and remove the two westerly ALS towers from the dunes and to relocate the "1000-foot light bar" (supported by three separate towers) to a location immediately east of Pershing Drive (outside the coast zone). The project also includes replacement of the

[1] The eastern boundary of the coastal zone in this area is the eastern right-of-way of Pershing Drive.

remaining seven ALS towers in the coastal zone with new towers as the existing structures have reached the end of their design life. The FAA will excavate and remove the existing concrete pads which support the two westerly ALS towers that will be deactivated, and excavate and remove the northern and southern concrete pads which currently support the "1000-foot light bar." The central pad will be retained in order to support a new single-pole ALS tower at this location. The nine existing ALS stations in the coastal zone are sited on concrete pads that total 555 sq.ft. The proposed relocation and upgrade project would remove from the dunes four concrete pads totaling 253.4 sq.ft. Minor excavation next to the concrete pads to be removed will be undertaken to disconnect buried electrical and communication lines to each of the tower stations. The replacement ALS towers will be installed on the existing concrete pads at the seven ALS stations. The project includes the installation of upgraded power and communication cables to the replacement ALS towers, using directional boring equipment rather than trenching to minimize ground disturbance between stations. Existing gravel and paved service roads which provide access to and connect each of the ALS stations will be used by construction personnel for construction access and staging.

The project area is located in the northern end of the approximate 300-acre El Segundo Dunes, an environmentally sensitive habitat area (ESHA), and the four eastern-most ALS towers are located within the extreme northern corner of the 203-acre dunes Habitat Restoration Area, the area occupied by the federally endangered El Segundo blue butterfly. However, in August 2014 the FAA undertook field surveys of the project area and confirmed that coast buckwheat – the host plant for the El Segundo blue butterfly – is not present in the vicinity of the nine subject ALS towers. The nearest coast buckwheat plants are located 300-500 feet south of the existing ALS stations and service road, and no coast buckwheat was observed north of the ALS stations. The FAA concluded that the proposed project would not affect any federally listed species or designated critical habitat in the El Segundo Dunes. Only scattered vegetation exists at, adjacent to, and between the ALS stations and when present is comprised of iceplant and other ornamental and non-native plants. All temporarily disturbed areas will be restored to pre-project conditions.

In November 2004 the Commission concurred with consistency determination CD-062-04 from the FAA for proposed reconfiguration of runway navigation aids in the El Segundo Dunes. That project was necessary due to a proposed realignment of runways and taxiways on the north side of LAX by Los Angeles World Airports. In its concurrence the Commission found that:

> [Coastal Act] *Section 30240(a) . . . states that within environmentally sensitive habitat areas, "only uses dependent on those resources shall be allowed within those areas." The FAA constructed the existing navigation aids located in the El Segundo Dunes between 1975 and 1977, and the Commission did not begin conducting federal consistency reviews until November 1978. As a result, no analysis occurred for consistency with the Section 30240(a) allowable use policy for the installation of the original navigation aids. Currently, however, the El Segundo Dunes is designated as an environmentally sensitive habitat and the proposed reconfiguration of the existing navigation aids is not a type of land use or development that is dependent on these coastal dune resources. The proposed installation of the new navigation aids and associated roads is therefore not consistent with the allowable*

> *use test of Section 30240(a) of the Coastal Act. As a result, the FAA is asserting that the proposed project is consistent to "the maximum extent practicable" with Section 30240(a).*

The Commission then noted that Section 930.32 of the Coastal Zone Management Act federal consistency regulations state that federal activities must be fully consistent with state coastal management programs unless:

> *. . . compliance is prohibited based upon the requirements of existing law applicable to the Federal agency's operations. If a Federal agency asserts that compliance with the management program is prohibited, it must clearly describe to the State agency the statutory provisions, legislative history, or other legal authority which limits the Federal agency's discretion to comply with the provisions of the management program.*

The findings for CD-062-04 further stated that the Commission reviewed the references to federal statute, regulations, and FAA advisories provided by the FAA to support the agency's assertion that full compliance with Section 30240(a) of the Coastal Act is prohibited by the requirements of existing law applicable to the FAA. The Commission concluded that there was a basis in the federal statutes that compelled LAWA to comply with the FAA advisories and standards for the design of runways and taxiways at LAX, in particular, FAA Advisory Circular 150/5300-13, Airport Design. The proposed realignment of the two runways in the north airfield at LAX would consequently mandate the reconfiguration of the existing navigation aids in the El Segundo Dunes that support flight operations on those runways. The Commission also determined that the FAA designed the reconfiguration project to minimize effects on environmentally sensitive habitat and would implement a habitat restoration plan to restore and enhance coastal dune habitat prior to the start of project construction.

The Commission concluded in its concurrence with CD-062-04 that:

> *Therefore, given the mandate for LAWA to comply with FAA standards for runway design, the FAA requirement to provide navigation aids for runway operations, a navigation aid reconfiguration plan that minimizes impacts to environmentally sensitive coastal dune habitat, and FAA's preparation of the El Segundo Dunes Habitat Restoration Plan, the Commission concludes that the proposed project is consistent to the maximum extent practicable with the environmentally sensitive habitat and wetlands policies (Section 30240 and 30233) of the Coastal Act.*

However, the reconfiguration of the north airfield runways at LAX was not implemented and the navigation aids for Runway 6R remained in place.

As with CD-062-04, the FAA is asserting that the proposed project is consistent to "the maximum extent practicable" with Section 30240(a). The FAA has cited in its negative determination Public Law 109-115 which mandates that the proposed ALS relocation and replacement for Runway 6R be completed by December 31, 2015. The FAA has designed the proposed project to minimize surface disturbance around the existing ALS stations during

removal and installation activities, to use the existing concrete pads to support the replacement ALS towers, to limit any minor expansion of concrete support pads to the minimum necessary, and to use existing gravel and paved roads to access all construction work areas. The proposed project area does not include any native vegetation, sensitive habitat, or coast buckwheat plants and is separated from this El Segundo blue butterfly host plant by at least 300 feet.

In conclusion, the Commission staff **agrees** that the proposed relocation and replacement of those parts of the LAX Runway 6R Approach Lighting System (ALS) located in the El Segundo Dunes will not adversely affect coastal zone resources. Under the federal consistency regulations (Section 15 CFR 930.35(a)), a negative determination can be submitted for an activity "which is the same or similar to activities for which consistency determinations have been prepared in the past." The proposed relocation and replacement of ALS towers is similar to a project concurred with by the Commission in CD-062-04 (but which was not constructed by the FAA due to circumstances beyond the agency's control). However, the proposed project would create significantly reduced impacts to sensitive habitat compared to the previously-approved project, due to its location further to the north, the lack of sensitive habitat in the project area, and the distance between the project area and coast buckwheat plants. While the project will create minor temporary impacts during removal and installation work, the project will also eliminate two ALS stations from the dunes, significantly reduce the size of a third station, and reduce by 47 percent the area of concrete pads in the dunes which support the federally-mandated ALS towers for Runway 6R. We therefore **concur** with your negative determination made pursuant to 15 CFR 930.35 of the NOAA implementing regulations. Please contact Larry Simon at (415) 904-5288 should you have any questions regarding this matter.

Sincerely,

CHARLES LESTER
Executive Director

cc: CCC – South Coast District
Evelyn Y. Quintanilla, Los Angeles World Airports