LAX Terminals 2 and 3 Modernization Project
Final EIR

ATTACHMENTS

Attachment 1 Original Comment Letters on the Draft EIR

Attachment 2 Traffic Counts – Imperial Highway East of Pershing Drive (August 22, 2014)

Attachment 3 NBEG Calculations and August 2016 and 2017 Flight Schedule Data for Delta Air Lines

June 2017

Prepared for:

Los Angeles World Airports
One World Way
Los Angeles, California 90045

Prepared by:

CDM Smith
111 Academy Way, Suite 150
Irvine, CA 92617

Attachment 1

LAX Terminals 2 and 3 Modernization Project
Final EIR

Original Comment Letters on the Draft EIR

June 2017

Prepared for:

Los Angeles World Airports
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Los Angeles, California 90045

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STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 7-OFFICE OF REGIONAL PLANNING
100 S. MAIN STREET, MS 16
LOS ANGELES, CA 90012
PHONE (213) 897-9140
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Serious Drought. Serious drought. Help save water!

April 10, 2017

Ms. Angelica Espirtu
Los Angeles World Airports
One World Way, 2nd Floor
Los Angeles, CA 90045

RE: Los Angeles international (LAX) Terminals 2 and 3 Modernization Project
Vic. LA-105,405
SCH # 2016081034
GTS# 07-LA-2016-00673ME-DEIR

Dear Ms. Espirtu:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The project involves the modernization of existing Terminals 2 and 3 at LAX to improve passenger level of service and amenities within the terminals. The modernization will include the interior and exterior of the terminals to improve the overall appearance and functionality.

The nearest State facilities to the proposed project are Interstates 105 and 405. Based on review of the Draft Environmental Review Document Caltrans has the following comments:

- It is noted that LAWA has established a "Ground Transportation/Construction Office" referred to as the CALM team. Please require the CALM team to coordinate and obtain Caltrans' approval for any detour plans and lane closures on Sepulveda Boulevard.
- Oversized construction truck deliveries expected to utilize State Highways will need a transportation permit and possible a Californian Highway Patrol (CHP) escort.
- Due to recurrent traffic congestion of I-405 and I-105 during peak commuting periods, please schedule heavy-duty construction-related trucks away from these periods as much as possible. Measures must be incorporated to contain all vehicle loads and avoid any tracking of materials, which may fall or blow onto Caltrans roadways or facilities during construction.

If you have any questions or concerns regarding these comments, please contact project coordinator Miya Edmonson at (213)-897-6536, or at miya.edmonson@dot.ca.gov, and refer to IGR# 07-LA-2016-00673.

Sincerely,

Melanie Bradford for

DIANNA WATSON
IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

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

T2/3-AS00001

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit

Edmund G. Brown Jr.
Governor

Ken Alex
Director

April 11, 2017

Angelica Espirtu
Los Angeles World Airports
One World Way, 2nd Floor
Los Angeles, CA 90045

Subject: Los Angeles International Airport (LAX) Terminals 2 and 3 Modernization Project
SCH#: 2016081034

Dear Angelica Espirtu:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on April 10, 2017, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan

Scott Morgan
Director, State Clearinghouse

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

T2/3-AS00002

Document Details Report
State Clearinghouse Data Base

SCH#	2016081034
Project Title	Los Angeles International Airport (LAX) Terminals 2 and 3 Modernization Project
Lead Agency	Los Angeles World Airports
Type	EIR Draft EIR
Description	The underlying purposes of improvements associated with the proposed project are to modernize existing Terminals 2 and 3 at LAX by improving security, passenger experience, operations, convenience, and quality of service.

Lead Agency Contact

Name	Angelica Espirtu
Agency	Los Angeles World Airports
Phone	800-919-3766 **Fax**
email	
Address	One World Way, 2nd Floor
City	Los Angeles **State** CA **Zip** 90045

Project Location

County	Los Angeles
City	Los Angeles, City of
Region	
Lat / Long	33° 56' 38" N / 118° 24' 14" W
Cross Streets	Sepulveda Blvd and Century Blvd
Parcel No.	
Township	**Range** **Section** **Base**

Proximity to:

Highways	1 (Lincoln/Sepulveda)
Airports	LAX
Railways	
Waterways	Pacific Ocean
Schools	St Bernard HS/El Seg HS
Land Use	LAX - A Zone; Airport Airside Sub-Area

Project Issues	Archaeologic-Historic; Traffic/Circulation; Cumulative Effects; Other Issues; Air Quality
Reviewing Agencies	Resources Agency; Department of Fish and Wildlife, Region 5; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Caltrans, Division of Aeronautics; California Highway Patrol; Caltrans, District 7; Regional Water Quality Control Board, Region 4; Air Resources Board; Native American Heritage Commission; Public Utilities Commission; State Lands Commission
Date Received	02/23/2017 **Start of Review** 02/23/2017 **End of Review** 04/10/2017

T2/3-AS0000-2

Note: Blanks in data fields result from insufficient information provided by lead agency.

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

SENT VIA EMAIL & USPS:
LAXStakeholderLiaison@lawa.org
Ms. Angelica Espiritu, City Planner
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

April 5, 2017

Draft Environmental Impact Report (DEIR) for the Proposed LAX Terminals 2 and 3 Modernization Project

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

The proposed project would modernize the existing facilities at Terminals 2 and 3. The improvements are intended to provide improved security, passenger experience, operations, convenience, and quality of service. The improvements would allow for the reconfiguration of the passenger gate positions and aircraft-parking layout at Terminals 2 and 3 to accommodate anticipated airline fleets and uses.

The proposed project would add a total of 832,000 square feet of new building space to the two terminals, thereby resulting 1,620,020 total square feet. It also includes aircraft apron area improvements, restriping of aircraft parking positions, passenger boarding bridge locations, and possibly the relocation of aircraft fuel hydrant pits at both terminals to be compatible with the proposed building changes and anticipated aircraft fleet and uses. The proposed project will be completed in stages and take approximately 76 months (six years and four months) to construct beginning in the fourth quarter of 2017. During construction, both terminals will remain operational at all times.

As shown in the DEIR's air quality and health risk analyses, the unmitigated construction emissions will be less than the SCAQMD's CEQA construction emission thresholds, except for NOx. Peak daily energy-related operational emissions were calculated and found to be less than the SCAQMD's CEQA operation emission thresholds. However, the unmitigated localized construction impacts relative to NOx would be significant. After incorporating mitigation measures, regional and localized emissions of NOx would remain significant. The proposed project's unmitigated cancer risks for residents and on-site workers are less than 3.5 in 1 million, which is below the significance threshold of 10 in 1 million.

The SCAQMD staff has comments on the air quality analysis. Details are included in the attachment. The attachment also includes a discussion of recommended changes to the existing mitigation measures for air quality and proposes new construction mitigation measures which the Lead Agency should implement to reduce the significant air quality impacts.

T2/3-AR00001

Pursuant to Public Resources Code Section 21092.5, the SCAQMD staff requests that the Lead Agency provide SCAQMD with written responses to all comments contained herein prior to the certification of the Final EIR. Further, staff is available to work with the Lead Agency to address these issues and any other questions that may arise. If you have any questions regarding this letter, please contact me at lsun@aqmd.gov or by phone at (909) 396-3308.

Sincerely,

Lijin Sun

Lijin Sun, J.D.
Program Supervisor, CEQA IGR
Planning, Rule Development & Area Sources

Attachment
JW:LS/JC/MS/GM
LAC170223-04
Control Number

ATTACHMENT

Air Quality Analysis

1. As stated in Section 2, *Project Description*, the Lead Agency proposes to use shuttle buses to move construction workers from offsite parking to the job site. Based on a review of the emission output, SCAQMD staff found that shuttle emissions were not included in the emission calculations. SCAMQD staff recommends calculating shuttle bus emissions and including them in the Final EIR.

Compliance with SCAQMD Rules and Identify SCAQMD as a Responsible Agency

2. Based on activities included in the project description, SCAQMD permits will be required. Although permit applications might have already been submitted to the SCAQMD Permitting and Engineering staff, the Final EIR should identify SCAQMD as a responsible agency for the proposed project activities. The reconfiguration of the aircraft fueling system hydrant locations will require permit applications and a health risk assessment under SCAQMD rules including Rule 461 – Gasoline Transfer and Dispensing; Rule 462 – Organic Liquid Loading; and Rule 1401 – New Source Review of Toxic Air Contaminants. For permit questions, please contact SCAQMD Permitting and Engineering staff at (909) 396-2562.

3. In the event that the proposed project requires the use of concrete produced at an on-site (on-airport) concrete batch plant, that may also require SCAQMD permit(s). Questions concerning permits for concrete batch plant operations can be directed to SCAQMD Permitting and Engineering staff at (909) 396-2504.

4. The proposed project will include soil disturbance of approximately 134,400 cubic yards of cut and fill. In the event that soil containing petroleum hydrocarbons is encountered during soil disturbance activities, the Final EIR should include a discussion to demonstrate compliance with SCAQMD's Rule 1166 – Volatile Organic Compound Emissions from Decontamination of Soil.

Recommended Changes to Existing Mitigation Measure LAX-AQ-1q

Technology Review

5. The DEIR includes 15 air quality mitigation measures, including a step-down provision in Mitigation Measure LAX-AQ-1q. The last bullet point in LAX-AQ-1q requires that LAWA conduct, from time-to-time, independent research and verification of the availability. Given that the construction phase for the proposed project would take more than six years, SCAQMD staff believes that the Lead Agency should take this opportunity to deploy the lowest emission technologies possible by requiring a review and implementation of new, feasible lower-emission technologies every two years and include it as a new mitigation measure in the Final EIR. This deployment should include those technologies that are "capable of being accomplished in a successful manner within a reasonable period of time" (Public Resources Code §21061.1), such as zero and near-zero emission technologies that are expected to be

T2/3-AR00001

available during the life of the project. A technology review that is performed every two years will allow the Lead Agency to assess equipment availability, equipment fleet mixtures, and best available emissions control devices. Additionally, to ensure that the biennial technology review is enforceable during the six-year construction phase, the SCAQMD staff recommends that the Lead Agency include the biennial technology review in the project contract agreement, including the Contractor agreement. Furthermore, when a new emission control technology is found to be feasible and would substantially reduce air emissions, but the Lead Agency declines to implement such technology, a subsequent EIR shall be prepared (CEQA Guidelines Section 15162(a)(3)(C)). The SCAQMD staff's recommended revisions to the last bullet point in LAX-AQ-1q are below:

"1q (the last bullet point): […] LAWA will, ~~from time-to-time~~ every two years, conduct a technology review, independent research and verification of the availability 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 good faith efforts and due diligence, and include the biennial technology review as a mandatory condition in the Contractor agreement."

Enforceability

6. Mitigation Measure LAX-AQ-1q provides circumstances under which the on-road haul truck and off-road construction equipment requirements set forth in Air Quality Standard Control Measures 1o and 1p would not apply. CEQA requires that mitigation measures must be fully enforceable through permit conditions, agreements, or other legally binding instruments (Public Resources Code Section 21081.6 (b) and CEQA Guidelines Section 15126.4 (a)(2)). To ensure that the requirement set forth in Air Quality Standard Control Measures 1o and 1p are enforceable, the SCAQMD staff's recommended revisions to mitigation measure LAX-AQ-1q are below:

"1q: The on-road haul truck and off-road construction equipment requirements set forth in Air Quality Standard Control Measures 1o and 1p above shall apply unless any of the following circumstances exist and the Contractor provides a written finding consistent with project contract requirements and obtains written approval from the Lead Agency that: […]."

Additional Mitigation Measures

7. CEQA requires that all feasible mitigation measures that go beyond what is required by law to minimize any significant impacts. The SCAQMD staff recommends that the Lead Agency include in the Final EIR additional mitigation measures provided below to further reduce the significant adverse construction-related air quality impacts.

Construction Mitigation Measures

1) Include in all construction contracts the requirement to use 2010 and newer diesel haul trucks (e.g., material delivery trucks and soil import/export). In the event that that 2010 model year or newer diesel trucks cannot be obtained, provide documentation as information becomes available and use trucks that meet EPA 2007 model year NOx emissions requirements.

2) Include in all construction contracts the requirement that all off-road diesel-powered construction equipment greater than 50 hp shall meet Tier 4 off-road emission standards at a minimum. In addition, if not already supplied with a factory-equipped diesel particulate filter, all construction equipment shall be outfitted with BACT devices certified by CARB. Any emissions control device used by the contractor shall achieve emissions reductions that are no less than what could be achieved by a Level 3 diesel emissions control strategy for a similarly sized engine as defined by CARB regulations. In addition, construction equipment shall incorporate, where feasible, emissions savings technology such as hybrid drives and specific fuel economy standards. In the event that any equipment required under this mitigation measure is not available, provide documentation as information becomes available. A copy of each unit's certified tier specification, BACT documentation, and CARB or SCAQMD operating permit at the time of mobilization of each applicable unit of equipment shall be provided. Encourage construction contractors to apply for SCAQMD "SOON" funding incentives to help accelerate the clean-up of off-road diesel vehicles, such as heavy duty construction equipment.

3) Enter into a contract that notifies all vendors and construction contractors that vehicle and construction equipment idling time will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB's Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will require the vehicle's operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers understand the vehicle and construction equipment idling requirement, post signs at each facility entry gates stating idling longer than five minutes is not permitted.

4) Employ on-road heavy-duty diesel trucks or equipment with a gross vehicle weight rating (GVWR) of 19,500 pounds or greater that complies with EPA 2007 on-road emission standards for PM and NOx (0.01 gram per brake horsepower - hour (g/bhp-hr) and at least 0.2 g/bhp-hr, respectively).

5) Maintain vehicle and equipment maintenance records for the construction portion of the proposed project. All construction vehicles must be maintained in compliance with the manufacturer's recommended maintenance schedule. The Lead Agency will maintain their construction equipment and the construction contractor will be responsible for maintaining their equipment and maintenance records. All maintenance records for each facility and their construction contractor(s) will remain on-site for a period of at least two years from completion of construction.

6) Conduct a survey of the proposed project construction area(s) to assess whether the existing infrastructure can provide access to electricity, as available, within the facility or construction site, in order to operate electric on-site mobile equipment. For example, each project applicant, project sponsor, or public agency and/or their construction contractor(s) will assess the number of electrical welding receptacles available.

   Construction areas within the facility or construction site where electricity is and is not available must be clearly identified on a site plan. The use of non-electric onsite mobile equipment shall be prohibited in areas of the facility that are shown to have access to

T2/3-AR00001

electricity. The use of electric on-site mobile equipment within these identified areas of the facility or construction site will be allowed.

Include in all construction contracts the requirement that the use of non-electric on-site mobile equipment is prohibited in certain portions of the facility as identified on the site plan. Maintain records that indicate the location within the facility or construction site where all electric and non-electric on-site mobile equipment are operated, if at all, for a period of at least two years from completion of construction.

7) Provide temporary traffic controls such as a flag person, during all phases of significant construction activity to maintain smooth traffic flow.

8) Provide dedicated turn lanes for the movement of construction trucks and equipment on- and off-site.

9) Re-route construction trucks away from congested streets or sensitive receptor areas.

10) Coordinate with the local city to improve traffic flow by signal synchronization in the area near the construction site.

11) Ensure that drivers understand that traffic speeds on all unpaved roads will be limited to 15 mph or less. In addition, post signs on all unpaved roads indicating a speed limit of 15 mph or less.

12) Schedule construction activities that affect traffic flow on the arterial system to occur during off-peak hours to the greatest extent practicable.

13) If and when winds speeds exceed 25 mph, suspend all excavating and grading activities and shall record the date and time when the use of construction equipment associated with these construction activities are suspended. This log shall be maintained on-site for a period of at least two years from completion of construction.

14) If and when any first stage smog alert occurs, record the date and time of each alert, suspend all construction activities that generate emissions, and record the date and time when the use of construction equipment and construction activities are suspended. This log shall be maintained on-site for a period of at least two years from completion of construction.

15) Coordinate with the construction contractor to site parking areas to minimize interference with roadway traffic.

16) Evaluate the use of alternate fuels for on-site mobile construction equipment prior to the commencement of construction activities, provided that suitable equipment is available for the activity. Equipment vendors shall be contacted to determine the commercial availability of alternate-fueled construction equipment. Priority should be given during the bidding process for contractors committing to use alternate-fueled construction equipment.

17) Include in all construction contracts the requirement to cover all haul trucks delivering or hauling away dirt, sand, soil, or other loose materials.

18) Require the construction contractor to install and use wheel washers where vehicles enter and exit the construction site onto paved roads or wash off trucks and any equipment leaving the site for each trip to prevent drag-out.

19) Require the construction contractor to apply non-toxic soil stabilizers according to manufacturers' specifications to all inactive construction areas (e.g., previously graded areas inactive for ten days or more).

20) Require the construction contractor to replace ground cover in disturbed areas as quickly as possible to minimize dust.

21) Require the construction contractor to pave road and road shoulders.

22) Require the construction contractor to sweep streets at the end of the day using SCAQMD Rule 1186 and 1186.1 compliant sweepers if visible soil is carried onto adjacent public paved roads. In the event that water sweepers are used, recommend the use of reclaimed water by construction contractor.

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OSA L. WOLFF
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April 10, 2017

Via E-Mail and FedEx

Angelica Espiritu
City Planner
Los Angeles World Airports
1 World Way
Los Angeles, CA 90045
LAXstakeholderliaison@lawa.org

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

Dear Ms. Espiritu:

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

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

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

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

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

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

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

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

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

Throughout the DEIR, LAWA claims that the Project's doubling of the existing square footage of Terminals 2 and 3 is merely to enhance the "passenger experience" and comply with security and screening regulations, and would not allow LAX to process more passengers than would be possible without the Project. *See, e.g.,* DEIR at 2-27 ("[T]he proposed improvements to, and additional floor area proposed for, T2 and T3 would also not increase operations or passenger volumes beyond what would occur without the project."). This is a bare assertion unsupported by evidence.[4] El Segundo has already explained at length in its comments on the LAMP DEIR and FEIR why LAWA cannot assume, without evidence, that major airport renovations—whether doubling the size of two passenger terminals with this Project, or relieving ground access constraints in the case of LAMP—would not help LAX to meet demand that it otherwise would be unable to meet. In order for LAWA not to analyze the effect of the Project on increased passenger and aircraft operations at LAX, the DEIR must demonstrate that LAX could accommodate SCAG's maximum forecasted capacity even without any changes to the airport before 2040 (including the Project). *See* El Segundo's comments on the LAMP DEIR at 2-5, attached as Exhibit C; El Segundo's comments on the LAMP FEIR at 1-4, attached as Exhibit D. El Segundo's comments on the Terminals 2 and 3 Modernization Project hereby incorporate by reference these comments on the LAMP DEIR and FEIR, including all attachments and exhibits thereto.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Because the DEIR takes the flawed position that the Project will not contribute at all toward higher passenger capacity or aircraft operations at LAX, the DEIR does not include *any* analysis of the Project's noise impacts. The exclusion of any significance determination or analysis regarding this noise impact, and the individual and cumulative impacts on people at LAX and adjoining neighborhoods, is a fatal flaw. The DEIR must be revised to resolve this obvious deficiency under CEQA.

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

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

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

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

Thus, although LAWA might be tempted to modify the DEIR to assert that aviation noise impacts resulting from the Project would be adequately addressed by existing mitigation adopted as part of the Master Plan, that approach would fail because those measures were not designed to mitigate noise from the passenger levels LAWA anticipates by the time the Project is fully built. Because LAWA has not justified its claim that the Project would not cause any impacts related to higher passenger levels or aircraft operations, the DEIR must be revised to include an analysis of the aviation noise impacts caused by the Project, and cumulative aviation noise impacts of other past, present or reasonably foreseeable future projects—not omit any discussion whatsoever of aviation noise impacts.

Finally, the DEIR's failure to provide any analysis of noise impacts from the Project's construction is a fatal flaw. Haul trucks, in particular, can be quite noisy. Moreover, the DEIR indicates that much of the construction will occur at night in an attempt to reduce construction-related traffic impacts. Increased noise levels at night can be particularly disruptive and can interfere with sleep. The revised DEIR must identify sensitive receptors along haul routes and evaluate how increases in noise from the Project's construction activities will impact these receptors. The revised analysis must also disclose the increase in noise levels from the cumulative increase in haul trucks from all of the projects identified in DEIR Tables 3-1 and 3-2.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

be exempt from a consistency determination with state and regional GHG reduction plans. We query why the DEIR would set forth a significance threshold calling for this analysis, only to ignore it. Moreover, the CEQA Guidelines instruct the lead agency to determine "[t]he extent to which the *project* complies with regulations or requirements adopted to implement a statewide, regional, or local plan for the reduction or mitigation of greenhouse gas emissions." CEQA Guidelines § 15064.4 (b)(3) (emphasis added). Finally, common sense dictates that individual projects must be held accountable for their roles in achieving or interfering with GHG reduction goals.

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

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

See El Segundo Comments on LAMP DEIR at 32.

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

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

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

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

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

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

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

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

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

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

VIII. Conclusion

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

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Osa L. Wolff

Laurel L. Impett, AICP, Urban Planner

Joseph D. Petta

Exhibits

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

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

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EXHIBIT I

T2/3-AL00001

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

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

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

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

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

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

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

T2/3-AL00001

Adib Kanafani

Professor of the Graduate School, University of California at Berkeley. Kanafani holds a Ph.D. in Civil Engineering from the University of California at Berkeley. Since joining the faculty at Berkeley in 1971 he has taught and conducted research on transportation systems, transportation engineering, airport planning and design, and air transportation economics. He has served on a number of national and international advisory panels to Government and industry. He was Director of Berkeley's Institute of Transportation Studies from 1982 to 1997, and Chairman of the Department of Civil and Environmental Engineering from 1997 to 2002, and Co-Director of the National Center of Excellence in Aviation Operations Research from 2001 to 2005. Kanafani's important contributions to air transportation include air transportation demand analysis, airport capacity analysis methods, and airline network analysis. His research on airline hubbing and on the relation between aircraft technology and airline network structure laid the ground for much of the work aimed at understanding the implications of airline deregulation in the late 1970's. He was a member of the research team that developed airport capacity analysis methods that are in widespread application in airport planning and design. Professor Kanafani has authored over 170 publications on transportation, including three books on Transportation Demand Analysis, on National Transportation Planning, and on the Economics of Networked Industries. He is a recipient of numerous including election to the U.S. National Academy of Engineering in 2002. He served as Chair of the Air Transport Division of the American Society of Civil Engineers, and as chair of the Transportation Research Board of the National Academies in 2009 and was named a Lifetime Associate of the National Academies in 2012.

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EXHIBIT J

T2/3-AL00001

T2/3-AL00001

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March 29, 2017

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

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

Dear Ms. Impett:

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

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

Construction Surface Transportation Analysis Review

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Specifically, DEIR p. 4.4-6 states:

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

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

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

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

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

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

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

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

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

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

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

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

Table 1
Construction Worker Gasoline Demand[1]

Phase	Trips	Trip Length (Miles)	Total Miles Traveled[2]	Gallons of Gasoline	Miles Per Gallon[3]
Airside Civil/Apron Work	5,180	40	207,440	16,498	12.57
Terminal 3BHS Sprung Building	310	40	12,400	5,050	2.46
Terminal 3 Concourse	7,166	40	286,640	71,829	3.99
Terminal 2& 3 Headhouse	5,267	40	210,680	246,465	0.85
Terminal 2 Concourse	5,785	40	231,400	93,603	2.47
Terminal 3 North (Satellite)	1,984	40	79,360	43,322	1.83
Terminal 3.5 Headhouse	3,705	40	148,200	112,458	1.32
TOTAL	29,403	40	1,176,120	589,225	2.00

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

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

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

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

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

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

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

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

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

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

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

CONCLUSION

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

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

Sincerely,

MRO ENGINEERS, INC.

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

877433.1

Exhibits A through O provided via CD by Shute, Mihaly & Weinberger LLP on behalf of the City of El Segundo are available for review at LAWA Environmental Programs Group, One World Way, Room 218, Los Angeles California, 90045, or on LAWA's website at: http://www.lawa.org/ourLAX/CurrentProjects under "LAX Terminal 2 & 3 Modernization Project" "Final Environmental Impact Report"

T2/3-AL00001

Golden State Environmental Justice Alliance
Green Jobs & Clean Communities
P.O. Box 79222
Corona, CA 92877

March 18, 2017

VIA EMAIL

Angelica Espirtu
Los Angeles World Airports
One World Way, Room 219
Los Angeles, CA 90045
laxstakeholderliaison@lawa.org

SUBJECT: COMMENTS ON LAX TERMINALS 2 AND 3 MODERNIZATION PROJECT EIR

To whom it may concern:

Thank you for the opportunity to comment on the Environmental Impact Report (EIR) for the proposed LAX Terminals 2 and 3 Modernization Project. Please accept and consider these comments on behalf of Golden State Environmental Justice Alliance. Also, Golden State Environmental Justice Alliance formally requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

T2/3-PC00001

1.0 Summary

As we understand it, the proposed project includes the improvement to and expansion of Terminals 2 and 3 of the Los Angeles International Airport (LAX). The proposed project includes reconfiguring existing passenger gate positions and adding four passenger gates within the existing terminal linear frontage; remodeling T2.5 and adding 446,835 sf of new floor area; remodeling T2 Concourse Building and adding 69,809 sf on new floor area; remodeling T3 Concourse Building and adding 122,357 sf of new floor area; remodeling T3.5 Ticketing Building and adding 192,991 sf of new floor area. 831,992 sf of new floor area will be added to create 1,620,010 sf of floor area overall at the project site.

2.6 Operation

The EIR indicates that the overall number of passenger gates at T2 and T3 will increase from 23 to 27 with implementation of the proposed project. Further, the additional passenger gate positions would result in additional gate dependencies. The Airport Terminology section does not provide a definition of "additional gate dependencies" but it can be inferred that this means that all 27 of the passenger gates will be utilized. The EIR concludes that the aircraft would be configured based on "sizes similar to or smaller than existing conditions", which logically enables the reader to conclude that if there are four additional passenger gates, then up to four similar size or smaller aircraft could be present at any given arrangement. The EIR does not present a sufficient argument to the public or decision-makers regarding the proposed project's inability to contribute to passenger growth. The EIR also states that passenger volume would occur without the project, but does not state how this would occur. The leaves the reader to assume this would occur by faster turnover of inbound/outbound flights, which would also lead the reader to the logical assumption that increasing the number of passenger gates would increase the number of passengers overall at LAX.

3.0 Overview of Project Setting

3.4 - Development Setting

The EIR includes Table 3-2 LAX Area Probable Development Projects which lists 212 cumulative projects in the area surrounding LAX. The EIR does not provide a map of those cumulative projects. It is vital for the public and decision-makers to view the 212 cumulative projects in relation to the project site on a map, especially when there are 26 cumulative projects

T2/3-PC00001

at the LAX property alone - 21 of which will be constructed concurrently with the proposed project. This does not comply with CEQA's requirements for meaningful disclosure.

4.1 Air Quality and Human Health Risk

The Air Quality Analysis assumes a five day work week but the construction schedule does not specify how many days per week construction will occur. There are three shifts: 7:00 AM - 3:00 PM, 3:00 PM - 11:00 PM, and 11:00 PM - 7:00 AM. Because the overnight shift ends the next day, construction is actually occurring at least six days per week. The AQA and Section 2.5 must be revised to accurately state the number of days per week construction will occur.

Figure 4.1.1-1 - Receptor Locations

The map provided is extremely difficult to read and understand. No arterial streets surrounding LAX are labeled and the sensitive receptors are not labeled, numbered, or able to be identified in any way other than their "type". There is no table provided that identifies the sensitive receptor, the type of receptor, and how far away it is from the project site and the LAX property. At minimum, the following sensitive receptors must be included for analysis:

1. St. Bernard High School (Playa del Rey)
2. Paseo Del Rey Elementary School (Playa del Rey)
3. Westchester Enriched Sciences Magnet School (Los Angeles)
4. Loyola Village Elementary School (Los Angeles)
5. Westchester Recreation Center, including the Skate Park, Golf Course, Pool and open fields (Los Angeles)
6. First Flight Child Development Center (Los Angeles)
7. Los Angeles Fire Department Station No. 5 (Los Angeles)
8. Visitation Catholic Church and School (Los Angeles)
9. Hyatt Regency (Los Angeles)
10. Courtyard by Marriot (Los Angeles)
11. El Segundo Dog Park (El Segundo)

The EIR is inadequate as an informational document because the reader is unable to identify any sensitive receptors depicted on Figure 4.1.1-1 provided. The EIR must be revised to include a map that labels/numbers each sensitive receptor and an accompanying table that lists pertinent information - the name of the receptor, the type of receptor, the distance from the project site,

T2/3-PC00001

and the distance from the LAX property in order to comply with CEQA's requirements for meaningful disclosure and to be an adequate informational document.

4.1.1.6 Impacts Analysis

The air quality analysis concludes that there would be significant and unavoidable impacts from NO_X. In keeping with *Bakersfield Citizens for Local Control v. City of Bakersfield* (2004) 124 Cal. App. 4th 1184, 1219-1220, the EIR should describe the health effects of this significant impact. There is some basic information at 4.1-2 on this point, but it only discusses the impacts of ozone, and does not specify if they are cumulative or short-term adverse health effects. Impacts from $PM_{2.5}$ and PM_{10} are only discussed cumulatively, even though they can result from NO_X emissions. It also does not address the health effects of DPM, which are considerable.

4.1.2.2.2 - Existing Health Risk in the Project Area

The EIR indicates that the nearest sensitive receptors to the project site are the El Segundo residential neighborhood located approximately 1,300 feet south of Runway 7R-25L and the Westchester residential neighborhood located approximately 1,300 feet north of Runway 6L-24R. However, on page 4.1-1 the EIR states that the project site is a far distance from sensitive receptors and the nearest sensitive receptors to the project site are the residential areas 3,200 feet to the north and the Hyatt Hotel on Century Boulevard approximately 2,000 feet to the east. The EIR presents conflicting information and is misleading to the public and decision-makers. Additionally, the distance of the sensitive receptors on page 4.1-1 is cited as the reason why odor impacts to sensitive receptors were not studied. This must be revised to accurately describe which sensitive receptors the analysis looked at with regard to odor impacts.

4.1.2.4.1 - Cancer Risks

The EIR states that 970 receptor locations were modeled, and refers the reader to Figure 4.1.1-1 for the receptor locations. Again, this location map does not enable the public to accurately discern where the receptors were placed on their properties, or which receptors were modeled for analysis. Table 4.1.2-2 is titled *Incremental Peak Construction-Related Cancer Risks for Maximally Exposed Individuals* but the EIR does not state who the Maximally Exposed Individual is, where they are located in relation to the project site, or where they were modeled for exposure.

4.4 Traffic

4.4.2.4 Determination of Future Cumulative Traffic Conditions

The EIR presents a "hybrid" of the two options to for determining cumulative impacts to traffic. The analysis increases "background" traffic by two percent to reflect growth from "non-specific projects". The EIR tells the reader that this is consistent with "previous direction first provided by LADOT for use in the SAIP construction traffic analysis" and the associated footnote from this statement indicates that such direction was given in 2005 and used for a number of subsequent projects listed. The EIR does not state if all of these projects are related to LAX, in the LAX area, have the potential to impact traffic in the same manner as LAX, or if the scope of the project involved construction for seven years like the proposed project.

The traffic analysis should be revised to present a project-specific analysis with regard for traffic impacts. Section 3.4 provides a list of 212 cumulative projects in the LAX vicinity. There is no reason to base traffic growth projections on "non-specific" projects when the EIR has provided 212 specific projects that are cumulatively considerable in relation to the proposed project. The EIR is inadequate as an informational document and misleading to the public and decision-makers. The EIR must be revised to present a project-specific analysis.

4.4.3.8 Future Cumulative Traffic

Table 4.4-6 Construction Project Trips Concurrent with the Proposed Project Construction Period indicates that the employee estimate is based on "473 peak day construction employees". Section 2.5 indicates that there will be 550 construction employees on a peak day of construction. The EIR presents conflicting information and must be revised to accurately analyze cumulative construct trips assuming the anticipated 550 peak construction employees.

Conclusion

For the foregoing reasons, GSEJA believes the EIR is flawed and an amended EIR must be prepared for the proposed project and recirculated for public review. Golden State Environmental Justice Alliance requests to be added to the public interest list regarding any subsequent environmental documents, public notices, public hearings, and notices of determination for this project. Send all communications to Golden State Environmental Justice Alliance P.O. Box 79222 Corona, CA 92877.

Sincerely,

FOR.

Board of Directors
Golden State Environmental Justice Alliance

LAX
Los Angeles World Airports

WRITTEN COMMENT FORM

PUBLIC WORKSHOP FOR THE LAX TERMINAL 2 AND 3 MODERNIZATION PROJECT
DRAFT ENVIRONMENTAL IMPACT REPORT (EIR)

The purpose of the scoping process and the meeting is to hear from the public and responsible agencies what significant environmental issues and alternatives they think should be analyzed in the Draft EIR for the LAX Terminal 2 and 3 Modernization Project. Written comments can be submitted at the Public Scoping meeting or mailed no later than 5:00 p.m. on **April 10, 2017**. In the space below (and on additional pages, if necessary), please provide any written comments you may have concerning the scope of the Draft EIR for the proposed Project. Your comments will then be considered during preparation of the Draft EIR.

Date: 3/21/17

Name: ROBERT ACHERMAN

Organization:

Address: 1504 ENGRACIA AVE, TORRANCE, CA 90501

Comment: THANK YOU FOR THE COMMITMENT TO NOT DEMOLISH THE T3 UNDERGROUND TUNNEL AND "SEA TO SHINING SEA" MOSAIC. PLEASE KEEP THE MOSAIC ACCESSIBLE TO THE PUBLIC (OR AT LEAST PASSENGERS)

FOOTNOTE 223, EIR PAGE 4.3-14

Please drop completed form into the box marked "COMMENTS" at the March 21, 2017 public meeting or mail to:

Angelica Espiritu, City Planner
City of Los Angeles, Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

All comments must be received no later than 5:00 p.m., April 10, 2017.

This form can simply be folded and placed in a mailbox. Please remember to add postage.

From: annambortolotti@gmail.com [mailto:annambortolotti@gmail.com]
Sent: Friday, March 31, 2017 1:50 PM
To: LAX Stakeholder Liaison
Subject: Stakeholder Comment Submitted - Ref. No. 170331135004

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

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

Reference No.:	170331135004
Date Submitted:	3/31/2017
From:	Anna Bortolotti
Email:	annambortolotti@gmail.com
Company Name:	
Address:	8600 Tuscany Ave Apt 414
City:	Playa Del Rey
State:	CA
Zip Code:	90293
Project Name:	LAX EDR – Terminal 2 & 3
Other Comments:	Im writing AGAINST the Terminals 2-3 Modernization Project. This project will result in neighborhood traffic, poor air quality, and will have an overall negative impact to the neighborhood. Are we able to vote against this project. Do we have a say in whether or not this moved forward. Thank you.

IP Address: 4.16.26.3

LOS ANGELES AREA CHAMBER OF COMMERCE

April 10, 2017

Angelica Espiritu
City Planner, Department of City Planning
Los Angeles World Airports
P.O. Box 92216
Los Angeles, CA 90009-2216

RE: Draft Environmental Impact Report, LAX Terminals 2 and 3 Modernization Project

Dear Ms. Espiritu,

On behalf of the Los Angeles Area Chamber of Commerce, which represents more than 1,650 businesses that collectively employ more than 650,000 people in the L.A. region, I am writing to express our strong support for the Los Angeles World Airports' (LAX) Modernization Project (proposed project) at Terminals 2 and 3 (T2 and T3). The proposed project is a vital transportation investment that will add much needed upgrades and a seamless experience for users.

The proposed project will modernize the 3rd busiest airport in the United States, helping employees, residents and visitors more readily access LAX facilities. This includes the modernization of the existing terminals T2 and T3, which will improve passenger level of service amenities within the terminals; help meet federal security requirements, improve passenger and baggage processing and inspections; improve building systems; and modernize the interior and exterior of the terminals to benefit the overall appearance of the CTA.

Additionally, existing passenger gate positions will be reconfigured; the T2 concourse will undergo updates; demolition and reconstruction of the T3 concourse building will provide additional concourse area, including a new operation control center. Aircraft apron area improvements are also set to take place under the proposed project. Given the magnitude of the proposed project with the significant updates, it would be completed in stages and require approximately 76 months to construct. The operation of the proposed project would provide improved passenger experience, convenience, and quality of service through much needed renovations of aging terminal facilities.

As demonstrated in the Draft Environmental Impact Report, it is clear that this proposed project will benefit the areas near and within the airport, and the region as a whole. Los Angeles is a world class city that deserves a world class airport and we hope that you will work to move this proposed project forward. Please feel free to contact Sarah Rascon at (213) 580-7573 or srascon@lachamber.com should you have any questions.

Sincerely,

Gary Toebben

Gary Toebben
President & CEO

350 S. Bixel St. | Los Angeles, CA 90017 | P: 213.580.7500 | F: 213.580.7511 | lachamber.com

Attachment 2

LAX Terminals 2 and 3 Modernization Project
Final EIR

Traffic Counts – Imperial Highway East of Pershing Drive (August 22, 2014)

June 2017

Prepared for:

Los Angeles World Airports
One World Way
Los Angeles, California 90045

Prepared by:

CDM Smith
111 Academy Way, Suite 150
Irvine, CA 92617

24 Hours Traffic Volume

City of Los Angeles
Department of Transportation

Counter	ARMANDO
Date	08/22/14
Start Time	12 AM

Location	**IMPERIAL HWY E/O PERSHING DR**	**Day of Week**	FRIDAY	**Prepared**	08/26/14
Direction	E/W STREET	**DOT District**	WESTERN	**By**	AMS
Serial Number	RD23080 D	**Weather**	CLEAR		

	NORTHBOUND or WESTBOUND					SOUTHBOUND or EASTBOUND					
Time	1ST QTR	2ND QTR	3RD QTR	4TH QTR	HOUR TOTAL	1ST QTR	2ND QTR	3RD QTR	4TH QTR	HOUR TOTAL	**TOTAL**
12 AM	39	30	37	43	149	85	58	56	50	249	398
1 AM	22	36	22	28	108	52	63	54	38	207	315
2 AM	23	21	12	14	70	33	32	28	16	109	179
3 AM	17	17	38	44	116	13	10	25	20	68	184
4 AM	56	83	107	167	413	10	11	22	32	75	488
5 AM	159	187	234	236	816	49	45	70	92	256	1072
6 AM	222	250	273	241	986	125	135	138	162	560	1546
7 AM	359	319	404	337	1419	158	159	259	231	807	2226
8 AM	336	285	334	297	1252	209	229	220	203	861	2113
9 AM	271	253	276	197	997	197	174	155	160	686	1683
10 AM	197	185	218	191	791	160	184	191	173	708	1499
11 AM	175	217	197	215	804	168	186	211	170	735	1539
12 NN	201	214	272	254	941	218	187	231	203	839	1780
1 PM	245	284	280	219	1028	206	200	260	255	921	1949
2 PM	228	214	222	211	875	292	235	267	260	1054	1929
3 PM	205	208	188	220	821	328	283	258	244	1113	1934
4 PM	253	229	228	253	963	234	252	273	225	984	1947
5 PM	254	247	277	243	1021	265	243	240	260	1008	2029
6 PM	254	226	227	222	929	214	236	206	247	903	1832
7 PM	219	202	191	179	791	224	205	160	173	762	1553
8 PM	183	183	191	185	742	171	193	162	129	655	1397
9 PM	173	187	190	175	725	119	114	142	148	523	1248
10 PM	149	144	131	90	514	230	177	183	166	756	1270
11 PM	84	61	58	48	251	138	112	129	121	500	751

FIRST 12-HOURS PEAK QUARTER COUNT	**404**	7 AM	3RD	**259**	7 AM	3RD
LAST 12-HOURS PEAK QUARTER COUNT	**284**	1 PM	2ND	**328**	3 PM	1ST
24 HOUR VEHICLES TOTAL		17,522			15,339	**32,861**
TOTAL VEHICLES STANDARD DEVIATION (STD)	[+,-]	362.82		[+,-]	317.12	637.88

PEAK HOURS VOLUME

	NORTH or WEST BOUND		SOUTH or EAST BOUND		BOTH DIRECTIONS	
	PEAK HOUR	VEHICLE VOLUME	PEAK HOUR	VEHICLE VOLUME	PEAK HOUR	VEHICLE VOLUME
First 12H Peak	7 AM	1,419	8 AM	861	7 AM	**2,226**
Last 12H Peak	1 PM	1,028	3 PM	1,113	5 PM	**2,029**
First 12H Peak STD	[+,-]	454.56	[+,-]	295.99	[+,-]	727.80
Last 12H Peak STD	[+,-]	216.46	[+,-]	192.13	[+,-]	378.01

IMPERIALHWY.PERSHING.140822.E-AUTO

Attachment 3

LAX Terminals 2 and 3 Modernization Project
Final EIR

NBEG Calculations
and
August 2016 and 2017 Flight Schedule Data for Delta Air Lines

June 2017

Prepared for:

Los Angeles World Airports
One World Way
Los Angeles, California 90045

Prepared by:

CDM Smith
111 Academy Way, Suite 150
Irvine, CA 92617

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Attachment 3.a.: Narrowbody Equivalent Gate Calculations for Terminals 2 and 3, August 2016

Terminal	Gate Number	Gate Gauge	ADG	Wingspan	Wingspan Divided by 118'
T2	21	A321	III	117.5	1.0
T2	21B	B757-200	IV	125.0	1.1
T2	23	A321	III	117.5	1.0
T2	25	B737-900	III	112.5	1.0
T2	27	B767	IV	156.2	1.3
T2	28	B747-400	V	213.0	1.8
T2	26	B747-400	V	213.0	1.8
T2	24	A321	III	117.5	1.0
T2	24A	B757-300	IV	125.0	1.1
T2	22	B767-300	IV	156.2	1.3
T3	39	A321	III	117.5	1.0
T3	38B	B777-300	V	199.8	1.7
T3	37B	B737-900W	III	117.4	1.0
T3	37A	B757-300	IV	125.0	1.1
T3	36	B737-900	III	112.5	1.0
T3	35	B767-300	IV	156.2	1.3
T3	34	B767-300	IV	156.2	1.3
T3	33B	B737-900W	III	117.4	1.0
T3	33A	B737-900W	III	117.4	1.0
T3	32	B737-900W	III	117.4	1.0
T3	31B	B737-900W	III	117.4	1.0
T3	31A	B737-900W	III	117.4	1.0
T3	30	A321	III	117.5	1.0
				Total:	26.8
Sources: Los Angeles World Airports, August 2016 (gate information); Federal Aviation Administration Advisory Circular 150/5300-13A, Airport Design, Table A1-1 p. 221 (aircraft wingspans).					

Attachment 3.b.: Number of Daily Operations By Airplane Design Group (ADG) for Airlines Operating at Terminals 2 and 3 in August 2016

Airline Code	Airline Name	ADG II	ADG III	ADG IV	ADG V	Total Daily Operations
4B	Boutique Airlines	5	-	-	-	5
4O	InterJet	-	6	-	-	6
AC	Air Canada	-	32	4	-	36
AM	Aeromexico	-	17	-	2	19
AV	Avianca Airlines	-	-	-	1	1
B6	jetBlue	-	30	-	-	30
EI	Aer Lingus	-	-	-	2	2
F9	Frontier Airlines	-	10	-	-	10
G4	Allegiant Air	-	14	3		17
HA	Hawaiian Airlines	-	-	2	10	12
NK	Spirit Airlines	-	52	-	-	52
QR	Qatar Airways	-	-	-	2	2
SY	Sun Country	-	6	-	-	6
VA	Virgin Australia	-	-	-	4	4
VS	Virgin Atlantic	-	-	-	4	4
VX	Virgin America	-	88	-	-	88
WS	West Jet	-	14	-	-	14
Y4	Volaris	-	17	-	-	17
Total Daily Operations		5	286	9	25	325
Percentage of Total Daily Operations		2%	88%	3%	8%	100%

Note: The published flight schedule for August 5, 2016 is representative of airline activity on a peak day in the peak month of August at LAX.

Source: Innovata, Inc., published flight schedule for August 5, 2016.

Attachment 3.c.: August 5, 2016 and August 3, 2017 Flight Schedules for Delta Air Lines (DL), including Compass Airlines and SkyWest (operating for Delta Air Lines), Aeromexico (AM) including Aerolitoral (5D operating for Aeromexico), WestJet (WS), Virgin Atlantic (VS) and Aer Lingus (EI)

August 5, 2016								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	757	877	369	7:50	8:55	IND	ATL	DL-1
DL	73H	1558	TOW	9:10	9:55	TPA	TOW	DL-1
DL	763	1706	333	10:30	11:30	DTW	DTW	DL-1
DL	319	2616	1325	12:00	12:40	SLC	MSY	DL-1
DL	757	1396	1649	13:55	14:55	SJO	MCO	DL-1
DL	73H	938	251	15:25	16:25	CUN	BNA	DL-1
DL	76W	458	637	17:00	18:40	JFK	HND	DL-1
DL	717	761	2778	19:25	20:00	LAS	SFO	DL-1
DL	75W	443	1162	20:35	21:30	JFK	JFK	DL-1
DL	E75	5809	5795	23:10	6:14	SJC	SJC	DL-1
DL	76W	TOW	476	5:10	6:10	TOW	JFK	DL-2
DL	77L	40	TOW	6:45	7:45	SYD	TOW	DL-2
DL	73H	110	227	9:00	9:59	ATL	SEA	DL-2
DL	73H	243	937	11:10	12:10	CVG	CUN	DL-2
DL	753	1555	1876	12:40	13:50	ATL	DTW	DL-2
DL	757	1755	1735	15:26	16:45	ATL	LIH	DL-2
DL	E75	5789	5722	17:12	17:55	SAN	SAT	DL-2
DL	76W	636	TOW	18:45	19:45	HND	TOW	DL-2
DL	73H	1061	1106	20:50	21:40	MCO	DTW	DL-2
DL	753	1845	1434	22:10	0:34	DTW	MSP	DL-2
DL	76W	TOW	611	7:35	8:35	TOW	HNL	DL-3
DL	73H	1578	511	8:56	9:45	SEA	RDU	DL-3
DL	73H	1974	2398	10:55	11:40	SEA	SEA	DL-3
DL	757	1659	101	12:30	13:29	MCO	ATL	DL-3
DL	757	821	260	14:13	15:09	DTW	MSP	DL-3
DL	73H	1157	1150	15:45	16:35	DTW	ATL	DL-3
DL	763	321	TOW	18:16	19:01	ATL	TOW	DL-3
DL	73H	511	1168	20:44	21:30	RDU	MIA	DL-3
DL	73H	2532	316	22:10	6:20	BOS	SEA	DL-3
DL	763	TOW	2222	6:10	7:10	TOW	ATL	DL-4
DL	CR9	4578	4831	7:35	8:15	DEN	SMF	DL-4
DL	73H	TOW	1061	8:45	9:45	TOW	MCO	DL-4
DL	73H	1169	301	10:15	11:00	MIA	TPA	DL-4
DL	E75	5778	5731	11:55	12:45	PHX	DFW	DL-4
DL	753	1655	1559	13:44	15:05	ATL	HNL	DL-4
DL	75W	423	2362	15:19	16:20	JFK	JFK	DL-4
DL	76W	1219	TOW	16:40	17:25	ATL	TOW	DL-4

August 5, 2016								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	757	1149	1149	17:57	19:12	DTW	HNL	DL-4
DL	73H	2434	2533	19:52	21:00	BNA	BOS	DL-4
DL	73H	154	342	21:57	22:45	TPA	CVG	DL-4
DL	76W	TOW	1154	0:01	0:45	TOW	ATL	DL-5
DL	739	TOW	2254	4:30	5:30	TOW	ATL	DL-5
DL	73H	817	118	7:40	8:25	SLC	BOS	DL-5
DL	739	574	741	9:25	10:25	GDL	PVR	DL-5
DL	73H	2531	921	11:16	12:17	BOS	CVG	DL-5
DL	73H	962	280	13:00	14:00	SAL	BOS	DL-5
DL	73H	546	1314	15:18	16:08	SEA	OAK	DL-5
DL	E75	5720	5687	16:50	17:30	SAT	LAS	DL-5
DL	73H	2319	998	18:00	18:50	BOS	SEA	DL-5
DL	76W	612	TOW	19:35	20:20	HNL	TOW	DL-5
DL	738	271	2259	21:18	22:09	SEA	TPA	DL-5
DL	73H	309	961	22:45	23:50	CUN	SAL	DL-5
DL	757	2222	2377	5:55	7:10	OGG	SLC	DL-6
DL	739	1327	719	8:25	9:20	CMH	DTW	DL-6
DL	E75	5795	5822	9:56	10:36	SJC	PHX	DL-6
DL	320	932	182	10:55	11:41	SLC	SLC	DL-6
DL	717	2761	254	12:25	13:03	SFO	LAS	DL-6
DL	73H	508	2492	15:15	16:05	MSP	SEA	DL-6
DL	73H	227	205	16:50	17:35	SEA	SEA	DL-6
DL	73H	198	1806	18:20	19:10	SEA	LAS	DL-6
DL	73H	1314	2277	19:45	20:37	OAK	SEA	DL-6
DL	319	1325	1121	21:20	22:20	MSY	RDU	DL-6
DL	717	1619	1257	7:00	7:40	OAK	OAK	DL-7
DL	319	835	1577	8:45	9:25	MSY	MSY	DL-7
DL	73H	742	2434	9:55	10:40	BNA	BNA	DL-7
DL	76W	472	406	11:40	12:40	JFK	JFK	DL-7
DL	CR9	4666	4708	13:11	13:56	TUS	BJX	DL-7
DL	CR9	4805	4736	14:42	15:22	SAN	LAS	DL-7
DL	320	2170	2004	15:57	16:45	SLC	SLC	DL-7
DL	73H	882	2332	17:35	18:20	CVG	SLC	DL-7
DL	73H	2602	694	19:38	20:23	SEA	SLC	DL-7
DL	CR9	4733	4593	21:02	21:42	DEN	TUS	DL-7
DL	717	670	918	22:10	6:30	PDX	PDX	DL-7
DL	757	2116	2116	5:06	6:05	KOA	MSP	DL-8
DL	E75	TOW	5710	6:43	7:28	TOW	LAS	DL-8
DL	320	2020	2158	7:50	8:38	MEM	MSP	DL-8
DL	717	2755	2758	9:25	10:00	SFO	SFO	DL-8
DL	717	2757	2760	10:25	11:00	SFO	SFO	DL-8
DL	717	1257	925	11:46	12:26	OAK	OAK	DL-8

Attachment 3

August 5, 2016								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	738	2201	848	13:44	14:35	SEA	SEA	DL-8
DL	319	1975	2592	15:36	16:40	MSY	MSY	DL-8
DL	739	770	1371	17:30	18:30	PVR	MSP	DL-8
DL	739	1788	TOW	19:58	20:58	DTW	TOW	DL-8
DL	717	2779	TOW	21:35	22:05	SFO	TOW	DL-8
DL	75W	477	1362	23:06	23:59	JFK	JFK	DL-8
DL	739	539	573	0:05	1:20	MSP	GDL	DL-9
DL	753	1212	1212	5:05	6:18	HNL	ATL	DL-9
DL	717	1936	1458	7:30	8:10	SJC	SJC	DL-9
DL	717	2202	753	8:45	9:25	PHX	PDX	DL-9
DL	73H	1097	862	9:55	10:40	RDU	MIA	DL-9
DL	717	1458	1545	11:34	12:15	SJC	SJC	DL-9
DL	739	1559	1554	13:36	15:00	MSP	ATL	DL-9
DL	717	925	670	15:55	16:35	OAK	PDX	DL-9
DL	320	1471	265	17:59	18:47	SLC	MEM	DL-9
DL	717	1721	1227	19:45	20:25	SJC	OAK	DL-9
DL	717	1181	223	21:05	21:45	SMF	SAN	DL-9
DL	73H	862	308	22:15	23:59	MIA	CUN	DL-9
DL	717	976	2754	7:25	8:00	SAN	SFO	DL-10
DL	717	1644	285	8:45	9:25	PDX	LAS	DL-10
DL	739	1414	2658	9:55	10:50	SLC	SLC	DL-10
DL	717	2759	2762	11:25	12:00	SFO	SFO	DL-10
DL	73H	128	129	12:40	13:27	SEA	SEA	DL-10
DL	717	753	696	15:00	15:40	PDX	SMF	DL-10
DL	717	637	2772	16:10	17:00	LAS	SFO	DL-10
DL	717	2814	2826	18:20	19:00	PDX	PHX	DL-10
DL	717	2777	2442	20:35	21:16	SFO	LAS	DL-10
DL	E75	5742	5810	22:15	6:25	YVR	DEN	DL-10
DL	75W	427	418	1:03	7:20	JFK	JFK	DL-11
DL	717	2753	2756	8:25	9:00	SFO	SFO	DL-11
DL	E75	5746	5847	9:50	10:35	MTY	SJC	DL-11
DL	CR9	4779	4805	11:30	12:10	SAN	SAN	DL-11
DL	75W	422	2262	12:50	13:50	JFK	JFK	DL-11
DL	717	2765	2768	14:25	15:00	SFO	SFO	DL-11
DL	717	1545	1721	15:40	16:20	SJC	SJC	DL-11
DL	717	2771	2774	17:25	18:00	SFO	SFO	DL-11
DL	717	2775	330	19:25	20:05	SFO	PDX	DL-11
DL	E75	5729	TOW	21:20	21:50	SAN	TOW	DL-11
DL	73H	1883	572	22:55	23:54	SEA	LIR	DL-11
DL	717	TOW	2752	6:15	7:00	TOW	SFO	DL-12
DL	E75	5781	5691	7:35	8:15	SMF	YVR	DL-12
DL	E75	5783	5720	9:10	9:50	GEG	SAT	DL-12

August 5, 2016								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	757	1255	2173	10:30	11:25	ATL	MSP	DL-12
DL	717	918	2814	12:10	12:50	PDX	PDX	DL-12
DL	717	2763	2766	13:25	14:00	SFO	SFO	DL-12
DL	E75	5714	5769	14:30	15:30	LAS	MTY	DL-12
DL	757	1298	1219	16:25	17:45	MSP	OGG	DL-12
DL	717	2773	2776	18:25	19:00	SFO	SFO	DL-12
DL	717	696	2510	19:30	20:10	SMF	SJC	DL-12
DL	E75	5687	TOW	21:05	21:35	LAS	TOW	DL-12
DL	763	2321	1254	22:00	23:15	MSP	ATL	DL-12
DL	757	1382	1506	5:30	6:45	LIH	DTW	DL-13
DL	E75	5829	5777	7:30	8:15	AUS	AUS	DL-13
DL	E75	5807	5735	9:04	9:45	DFW	DFW	DL-13
DL	E75	5683	5856	11:10	11:50	YVR	SMF	DL-13
DL	717	2376	2764	12:20	13:00	LAS	SFO	DL-13
DL	E75	5822	5828	14:14	14:54	PHX	PHX	DL-13
DL	717	2767	2770	15:25	16:00	SFO	SFO	DL-13
DL	E75	5842	5702	17:10	17:55	MCI	MCI	DL-13
DL	E75	5828	5809	18:30	19:10	PHX	SJC	DL-13
DL	E75	5799	5825	19:42	20:55	TUS	GEG	DL-13
DL	76W	41	1908	21:35	22:35	JFK	JFK	DL-13
DL	757	945	1393	22:58	23:58	SLC	GUA	DL-13
DL	319	TOW	1404	5:00	6:00	TOW	SLC	DL-14
DL	73H	2808	199	7:30	8:15	LAS	SEA	DL-14
DL	E75	5703	5842	8:45	9:25	MCI	MCI	DL-14
DL	E75	5710	5714	10:35	11:15	LAS	LAS	DL-14
DL	757	1392	2204	12:00	13:00	GUA	SLC	DL-14
DL	E75	5847	5830	13:57	14:40	SJC	SJC	DL-14
DL	E75	5771	5804	16:05	16:47	SMF	DFW	DL-14
DL	E75	5830	5729	18:02	18:42	SJC	SAN	DL-14
DL	E75	5845	5730	19:31	20:27	AUS	YVR	DL-14
DL	77L	TOW	41	21:50	22:50	TOW	SYD	DL-14
DL	757	2355	1388	23:30	0:45	ATL	SJO	DL-14
DL	E75	TOW	5707	6:00	6:45	TOW	DFW	DL-15
DL	E75	5723	5778	7:30	8:15	SAT	PHX	DL-15
DL	CR9	4784	4493	9:15	10:00	BJX	TUS	DL-15
DL	76W	424	471	10:15	11:15	JFK	JFK	DL-15
DL	E75	5810	5802	12:15	12:55	DEN	AUS	DL-15
DL	E75	5707	5789	13:56	14:39	DFW	SAN	DL-15
DL	E75	5777	5799	15:11	15:51	AUS	TUS	DL-15
DL	E75	5735	5805	17:10	17:50	DFW	AUS	DL-15
DL	CR9	4636	4688	18:54	19:34	DEN	DEN	DL-15
DL	E75	5754	5744	20:27	21:45	PHX	SMF	DL-15

Attachment 3

August 5, 2016								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	757	2255	979	22:10	23:12	ATL	IND	DL-15
DL	CR9	4696	4779	7:35	8:15	BOI	SAN	DL-16
DL	CR9	4572	4720	8:45	9:25	TUS	DEN	DL-16
DL	77L	284	185	11:00	13:25	NRT	PVG	DL-16
DL	CR9	4720	3558	15:05	15:45	DEN	DEN	DL-16
DL	717	2769	1181	16:25	17:11	SFO	SMF	DL-16
DL	CR9	4736	4704	18:34	19:14	LAS	BOI	DL-16
DL	E75	5731	5787	20:15	21:10	DFW	PHX	DL-16
DL	739	1211	1170	21:44	22:40	SLC	CMH	DL-16
DL	753	1434	1459	23:15	7:05	HNL	MSP	DL-16
AM	7S8	640	631	7:30	9:15	GDL	MEX	T2-T3_1
AM	738	782	783	11:10	12:40	GDL	GDL	T2-T3_1
EI	332	145	144	18:00	19:50	DUB	DUB	T2-T3_1
WS	73W	1512	T-I	21:31	22:01	YYC	T-I	T2-T3_1
AM	738	630	18	23:28	6:07	MEX	MEX	T2-T3_1
AM	737	646	645	9:18	11:18	MEX	MEX	T2-T3_2
5D	ER4	2200	2201	12:06	13:21	HMO	HMO	T2-T3_2
WS	73H	1510	1511	16:19	17:05	YYC	YYC	T2-T3_2
AM	7S8	644	641	17:48	19:20	MEX	GDL	T2-T3_2
WS	73H	1702	1513	22:40	8:45	YVR	YYC	T2-T3_2
WS	73H	1696	1697	11:00	11:45	YVR	YVR	T2-T3_3
VS	789	7	8	14:30	17:50	LHR	LHR	T2-T3_3
VS	789	23	24	18:55	20:55	LHR	LHR	T2-T3_3
AM	738	1630	TOW	22:39	23:39	MEX	TOW	T2-T3_3
WS	73W	T-I	1701	7:50	8:35	T-I	YVR	T2-T3_4
AM	787	19	647	11:50	13:30	MEX	MEX	T2-T3_4
AM	7S8	642	643	14:55	17:45	MEX	MEX	T2-T3_4
AM	7S8	648	649	20:30	23:01	MEX	MEX	T2-T3_4
WS	73W	1100	1101	11:42	12:40	YYZ	YYZ	T2-T3_5
WS	73H	1698	1699	19:20	20:05	YVR	YVR	T2-T3_5
AM	738	784	785	22:05	23:35	GDL	GDL	T2-T3_5
WS	73H	1422	1423	11:15	12:00	YEG	YEG	T2-T3_6
DL	757	TOW	1196	7:30	8:30	TOW	OGG	Unassigned
DL	333	TOW	40	7:40	8:40	TOW	JFK	Unassigned
DL	753	1719	1719	9:11	10:30	MSP	HNL	Unassigned
DL	77L	TOW	283	9:35	10:35	TOW	NRT	Unassigned
DL	757	185	1754	9:55	10:50	MCO	ATL	Unassigned
DL	763	311	1654	11:05	12:10	MSP	ATL	Unassigned
DL	763	1455	311	11:45	12:45	ATL	MSP	Unassigned
DL	CR9	4831	4636	12:25	13:15	SMF	DEN	Unassigned
DL	757	1150	1298	15:40	17:00	HNL	KOA	Unassigned
DL	77L	186	TOW	16:50	17:50	PVG	TOW	Unassigned

August 5, 2016								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	333	419	TOW	19:00	20:00	JFK	TOW	Unassigned
DL	753	518	1406	19:52	22:45	ATL	DTW	Unassigned
DL	757	1468	186	20:00	21:45	MSP	MCO	Unassigned
DL	757	1682	1354	20:50	22:20	ATL	ATL	Unassigned
DL	757	1354	TOW	21:25	22:25	OGG	TOW	Unassigned

August 3, 2017								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
AM	737	TOW	18	5:25	6:10	TOW	MEX	1
DL	E75	TOW	5793	6:45	7:15	TOW	LAS	1
DL	E75	5723	5784	7:45	8:15	SAT	PHX	1
AM	7S8	646	645	9:10	11:10	MEX	MEX	1
AM	738	19	647	11:45	13:15	MEX	MEX	1
DL	CR7	4503	4836	13:50	14:25	TUS	TUS	1
AM	738	642	643	14:55	16:25	MEX	MEX	1
EI	332	145	144	18:05	19:50	DUB	DUB	1
DL	E7W	4925	4926	20:20	21:00	SFO	SFO	1
AM	738	648	785	21:30	0:30	MEX	GDL	1
DL	320	TOW	1404	5:15	6:00	TOW	SLC	2
DL	E7W	4800	4902	7:15	8:00	SAN	SFO	2
DL	CR7	4839	4614	8:45	9:30	TUS	TUS	2
AM	738	782	783	11:10	12:40	GDL	GDL	2
DL	E75	5812	5774	13:37	14:45	SJC	PHX	2
DL	E7W	4915	4918	15:20	16:00	SFO	SFO	2
AM	7S8	644	667	16:40	18:10	MEX	MEX	2
DL	E75	5791	TOW	18:44	19:14	SMF	TOW	2
DL	738	1409	877	21:50	22:30	RDU	IND	2
DL	E75	5762	5710	7:25	8:15	OAK	AUS	3
DL	E75	5690	5772	9:06	9:45	GEG	DFW	3
DL	E75	5746	5820	10:15	11:55	MTY	SAN	3
DL	E7W	4815	4593	12:30	13:15	LAS	LAS	3
DL	E75	5828	5711	14:45	15:15	PHX	LAS	3
DL	E75	5705	5728	15:55	16:55	OAK	DFW	3
DL	CR7	4836	4792	18:26	19:30	TUS	TUS	3
DL	E75	5731	5724	20:09	21:05	DFW	OAK	3
DL	E75	5761	5704	21:41	6:15	SJC	SJC	3
DL	E75	5767	5702	7:30	8:15	SMF	OAK	4
DL	E75	5772	5785	9:07	10:15	DFW	SJC	4
DL	E75	5807	5726	10:50	12:05	YVR	SMF	4
DL	76W	428	TOW	13:00	13:45	JFK	TOW	4
DL	E75	5726	5734	16:05	17:40	SMF	SMF	4

Attachment 3

August 3, 2017								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	E75	5711	5730	18:14	18:55	LAS	YVR	4
DL	E75	5684	5766	19:25	20:20	AUS	GEG	4
DL	E7W	3549	4448	21:00	22:15	DEN	SAN	4
DL	738	632	961	23:00	23:55	SEA	SAL	4
DL	717	TOW	69	6:15	6:45	TOW	PDX	5
DL	E75	TOW	5747	7:40	8:10	TOW	SMF	5
DL	E7W	3545	4815	8:40	9:10	DEN	LAS	5
DL	E75	5694	5828	10:07	11:10	SMF	PHX	5
DL	E75	5747	5705	11:45	12:30	SMF	OAK	5
DL	E75	5763	5680	14:15	14:45	DFW	SAN	5
DL	E7W	4827	4449	16:15	17:15	LAS	LAS	5
DL	E75	5720	5713	18:05	18:45	SAT	PHX	5
DL	E75	5733	5764	20:10	21:15	OAK	SMF	5
AM	738	784	649	22:05	23:30	GDL	MEX	5
DL	E75	5695	5771	7:55	8:50	MCI	SAN	6
DL	E7W	4903	4906	9:20	10:00	SFO	SFO	6
DL	E75	5771	5684	11:27	12:25	SAN	AUS	6
DL	E7W	4913	4916	14:20	15:00	SFO	SFO	6
DL	75W	423	TOW	15:35	16:20	JFK	TOW	6
DL	E75	5680	5761	17:05	18:15	SAN	SJC	6
DL	76W	1284	TOW	18:45	19:30	HNL	TOW	6
DL	738	1325	1314	21:30	22:30	MSY	CVG	6
DL	E75	5725	5786	8:05	9:20	PHX	MCI	7
DL	E75	5793	5846	10:15	11:15	LAS	LAS	7
DL	E75	5702	5731	11:48	12:45	OAK	DFW	7
DL	E75	5786	5682	17:05	17:55	MCI	MCI	7
DL	E75	5845	5780	21:07	6:30	SAN	DFW	7
DL	757	1455	1129	5:00	6:30	OGG	ATL	8
DL	738	TOW	2377	6:55	7:40	TOW	SLC	8
DL	E7W	4564	4608	8:44	9:20	BOI	DEN	8
DL	E7W	4905	4908	10:20	11:00	SFO	SFO	8
DL	E75	5784	TOW	11:55	12:25	PHX	TOW	8
DL	717	2763	2764	13:20	14:00	SFO	SFO	8
DL	E7W	4608	3549	14:50	15:45	DEN	DEN	8
DL	E75	5848	5722	17:05	17:50	DFW	SAT	8
DL	E7W	3547	4601	18:31	19:25	DEN	DEN	8
DL	757	1468	TOW	19:55	20:40	MSP	TOW	8
DL	E75	5734	TOW	21:13	21:58	SMF	TOW	8
DL	738	309	308	23:10	23:59	CUN	CUN	8
DL	753	1212	1262	5:05	6:15	HNL	MSP	9
DL	717	1985	1562	7:27	8:15	SJC	SJC	9

August 3, 2017								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	E75	5704	5720	9:39	10:45	SJC	SAT	9
DL	E7W	4748	3547	12:06	12:45	DEN	DEN	9
DL	E75	5710	5733	15:05	16:30	AUS	OAK	9
DL	E7W	4919	4922	17:20	18:00	SFO	SFO	9
DL	717	643	839	19:17	20:35	LAS	SJC	9
DL	717	637	TOW	21:12	21:42	PDX	TOW	9
DL	753	1434	1344	23:05	0:30	HNL	MSP	9
DL	717	2755	2756	8:20	9:00	SFO	SFO	10
DL	738	7	1169	9:42	10:45	SLC	MIA	10
WS	73W	1100	1101	12:08	12:58	YYZ	YYZ	10
DL	717	68	637	14:46	15:45	PDX	PDX	10
DL	717	2765	2776	16:20	17:00	SFO	SFO	10
DL	E75	5782	5845	17:32	18:35	SJC	SAN	10
DL	717	1948	916	19:39	21:05	SJC	LAS	10
DL	757	2321	1352	22:03	23:55	MSP	DTW	10
DL	717	1719	1355	8:33	9:35	PDX	PDX	11
DL	75W	TOW	40	10:15	11:00	TOW	JFK	11
DL	717	1562	1873	11:38	12:20	SJC	SJC	11
DL	738	691	2319	13:00	14:05	LIR	BOS	11
DL	717	1873	1948	15:27	16:20	SJC	SJC	11
DL	738	2434	TOW	19:30	20:15	BNA	TOW	11
DL	717	2781	2754	21:20	7:00	SFO	SFO	11
DL	319	1644	2929	8:45	10:20	AUS	YVR	12
DL	717	2757	2760	11:20	12:00	SFO	SFO	12
DL	757	1125	1649	13:45	14:45	ATL	MCO	12
DL	738	2854	632	15:15	16:00	SEA	SEA	12
DL	319	TOW	748	17:05	17:50	TOW	AUS	12
DL	717	2777	1284	18:20	19:25	SFO	PDX	12
DL	739	1269	TOW	20:00	20:45	DTW	TOW	12
DL	738	2810	1121	21:15	22:10	SEA	RDU	12
AM	7S8	630	TOW	23:28	23:59	MEX	TOW	12
DL	757	TOW	1388	0:01	0:30	TOW	SJO	13
DL	76W	TOW	763	5:20	6:05	TOW	JFK	13
DL	738	820	2531	7:31	8:30	LAS	BOS	13
DL	319	2020	TOW	9:05	9:50	MEM	TOW	13
DL	738	861	1821	10:30	11:30	SEA	SEA	13
DL	717	956	716	12:05	12:55	PDX	PDX	13
DL	738	1449	570	15:20	16:15	MSP	DTW	13
DL	319	2928	1316	17:05	18:20	YVR	MEM	13
DL	738	998	2532	19:45	22:00	SEA	BOS	13
DL	753	2255	1195	22:25	23:45	ATL	ATL	13

Attachment 3

August 3, 2017								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	738	817	1421	8:05	8:45	SLC	MSP	14
DL	738	742	1097	9:15	10:25	BNA	RDU	14
WS	73H	1696	1697	10:54	11:45	YVR	YVR	14
DL	E7W	4909	4912	12:20	13:00	SFO	SFO	14
DL	753	1543	1559	13:45	14:55	MSP	HNL	14
DL	738	1975	2273	15:45	16:40	MSY	SLC	14
DL	738	770	664	17:15	19:00	PVR	SEA	14
DL	738	1400	1461	21:00	22:05	TPA	TPA	14
WS	73H	1702	T-I	22:39	23:09	YVR	T-I	14
DL	753	2116	1215	5:30	7:45	KOA	ATL	15
DL	738	1327	835	8:45	9:25	CMH	MSY	15
DL	738	1169	1246	10:13	11:20	MIA	CVG	15
DL	739	821	TOW	12:05	12:50	DTW	TOW	15
DL	757	1396	1438	14:00	15:20	SJO	MSP	15
DL	738	798	1150	16:00	16:45	SJD	ATL	15
DL	738	1471	1486	17:58	19:05	SLC	LAS	15
DL	738	1211	1170	21:17	22:15	SLC	CMH	15
DL	75W	TOW	1362	23:14	23:59	TOW	JFK	15
DL	757	1382	2116	5:50	7:30	LIH	MSP	16
DL	738	835	344	8:45	9:55	MSY	SJD	16
DL	738	1246	937	10:35	11:40	CVG	CUN	16
DL	738	128	2204	12:15	13:15	SEA	SLC	16
DL	757	1545	1554	14:14	15:30	DTW	ATL	16
DL	738	882	1268	16:07	17:00	CVG	BNA	16
DL	738	1821	998	18:15	20:30	SEA	SEA	16
DL	757	1061	1154	21:09	0:55	MCO	ATL	16
DL	738	979	2794	8:45	9:30	IND	DTW	17
DL	738	2509	6	10:53	11:40	SLC	SLC	17
DL	757	1659	1427	12:30	13:55	MCO	OGG	17
DL	739	2170	2332	16:13	18:35	SLC	SLC	17
DL	753	1218	TOW	19:20	20:05	ATL	TOW	17
DL	E7W	4449	4748	22:35	6:30	LAS	DEN	17
DL	76W	475	407	0:30	7:30	JFK	JFK	18
DL	738	2794	741	8:55	10:00	DTW	PVR	18
DL	75W	424	TOW	10:35	11:20	JFK	TOW	18
DL	738	1253	1325	11:30	12:55	BOS	MSY	18
DL	E75	TOW	5782	13:45	14:15	TOW	SJC	18
DL	75W	TOW	759	15:15	16:00	TOW	JFK	18
DL	738	TOW	2592	16:20	17:05	TOW	MSY	18
DL	738	1338	2260	18:20	20:30	BOS	SLC	18
DL	757	1196	1244	21:10	22:45	OGG	ATL	18

August 3, 2017								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	738	1558	2658	9:00	10:15	TPA	SLC	19
DL	738	938	129	11:30	13:00	CUN	SEA	19
DL	738	2787	633	16:45	17:30	SEA	SEA	19
DL	753	TOW	1149	18:10	18:55	TOW	HNL	19
DL	757	1720	1106	20:25	22:15	ATL	DTW	19
DL	75W	270	1631	23:00	8:30	JFK	DCA	19
WS	73H	T-I	1513	8:00	8:45	T-I	YYC	20
DL	738	2595	2787	9:00	10:00	SEA	SEA	20
DL	753	1706	1706	10:54	11:45	DTW	DTW	20
DL	757	1206	1257	12:40	14:15	ATL	ATL	20
DL	757	1755	1735	15:20	16:45	ATL	LIH	20
DL	757	1149	TOW	17:35	18:20	DTW	TOW	20
DL	333	215	TOW	19:25	20:10	JFK	TOW	20
DL	757	1682	186	21:25	22:45	ATL	MCO	20
DL	738	1118	2434	9:05	10:25	ATL	BNA	21
DL	757	1358	101	11:36	13:00	MSP	ATL	21
DL	753	1150	1298	15:43	17:05	HNL	KOA	21
DL	757	1133	TOW	17:40	18:25	ATL	TOW	21
WS	73H	1698	1699	19:19	20:15	YVR	YVR	21
DL	738	2533	2854	21:55	8:15	BOS	SEA	21
DL	333	TOW	474	7:45	8:45	TOW	JFK	22
DL	738	1097	1558	9:25	10:30	RDU	TPA	22
DL	757	1392	1876	12:00	13:50	GUA	DTW	22
DL	E75	5820	5791	14:25	15:10	SAN	SMF	22
DL	757	1220	1371	16:40	17:45	ATL	MSP	22
DL	75W	41	1162	20:30	21:30	JFK	JFK	22
DL	757	1845	1393	22:14	23:55	DTW	GUA	22
DL	757	TOW	1061	9:00	9:45	TOW	MCO	23
DL	757	TOW	2173	10:15	11:00	TOW	MSP	23
DL	76W	TOW	416	11:45	12:30	TOW	JFK	23
DL	76W	TOW	2262	13:15	14:00	TOW	JFK	23
DL	757	1332	1219	16:40	17:55	MSP	OGG	23
VS	789	23	24	18:50	21:10	LHR	LHR	23
DL	76W	273	1283	21:50	8:25	JFK	HNL	23
DL	757	2222	1196	7:00	8:35	OGG	OGG	24
DL	753	1419	1719	9:16	10:25	MSP	HNL	24
DL	76W	472	TOW	11:50	12:35	JFK	TOW	24
VS	789	7	8	13:20	15:45	LHR	LHR	24
DL	76W	458	TOW	17:10	17:55	JFK	TOW	24
DL	E75	5774	5699	18:28	19:30	PHX	SMF	24
DL	CR7	4705	4770	20:15	21:15	PHX	PHX	24

Attachment 3

August 3, 2017								
Airline	**Aircraft**	**Arrival #**	**Departure #**	**Arrival Time**	**Departure Time**	**Origin**	**Destination**	**Gate Position #**
DL	76W	TOW	1908	22:00	22:45	TOW	JFK	24
DL	738	945	2514	23:16	6:15	SLC	SEA	24
DL	77L	TOW	174	8:00	9:00	TOW	ATL	25
DL	757	TOW	1754	9:45	10:30	TOW	ATL	25
DL	77L	110	185	11:20	13:25	ATL	PVG	25
DL	E75	5846	5769	14:15	15:00	LAS	MTY	25
DL	77L	186	TOW	17:05	18:05	PVG	TOW	25
DL	E7W	4923	4615	19:20	19:55	SFO	BOI	25
DL	75W	1726	TOW	20:30	21:15	DCA	TOW	25
DL	77L	TOW	41	21:46	22:46	TOW	SYD	25
DL	757	1128	1216	23:50	5:30	ATL	ATL	25
DL	77L	40	TOW	8:05	9:05	SYD	TOW	26
DL	753	1172	1140	10:05	11:45	ATL	ATL	26
DL	320	2616	TOW	12:07	12:52	SLC	TOW	26
DL	738	1470	2810	13:45	14:30	SEA	SEA	26
VS	789	141	142	16:10	18:30	LHR	LHR	26
WS	73H	1102	1103	21:23	22:55	YYZ	YYZ	26
DL	757	1330	1326	23:50	7:00	MSP	DTW	26
DL	757	185	1347	10:08	12:30	MCO	MSP	27
WS	73H	1510	1511	16:14	17:05	YYC	YYC	27
DL	717	716	2762	18:19	19:00	PDX	SFO	27
WS	73W	1512	1701	21:29	8:35	YYC	YVR	27
DL	777	6	7	9:28	11:28	HND	HND	Unassigned

Key Tables:

5D	Aeromexico Connect
AM	Aeromexico
DL	Delta Air Lines
EI	Aer Lingus
VS	Virgin Atlantic
WS	WestJet
319	Airbus A319
320	Airbus A320
332	Airbus A330-200
333	Airbus A330-300
717	Boeing 717-200
737	Boeing 737-700
738	Boeing 737-800
739	Boeing 737-900

753	Boeing 757-300
757	Boeing 757-200
763	Boeing 767-300
777	Boeing 777-200
787	Boeing 787-8
789	Boeing 787-9
73H	Boeing 737-800 (Winglets)
73W	Boeing 737-700 (Winglets)
75W	Boeing 757-200
76W	Boeing 767-300ER
77L	Boeing 777-200LR
7S8	Boeing 737-800
CR7	Canadair Regional Jet 700
CR9	Canadair Regional Jet 900
E75	Embraer 175
E7W	Embraer 175
ER4	Embraer 145
ATL	Atlanta(Intl), GA, USA
AUS	Austin(Bergstrom Intl), TX, USA
BJX	Leon/Guanajuato, Mexico
BNA	Nashville(Intl), TN, USA
BOI	Boise, ID, USA
BOS	Boston(Intl), MA, USA
CMH	Columbus(Intl), OH, USA
CUN	Cancun, Mexico
CVG	Cincinnati(Intl), OH, USA
DCA	Washington (Reagan Nat'l), DC, USA
DEN	Denver(Intl), CO, USA
DFW	Dallas/Ft. Worth(Intl), TX, USA
DTW	Detroit(Metro Wayne), MI, USA
DUB	Dublin, Ireland
GDL	Guadalajara, Mexico
GEG	Spokane(Intl), WA, USA
GUA	Guatemala City, Guatemala
HMO	Hermosillo, Mexico
HND	Tokyo Haneda, Japan
HNL	Honolulu, Oahu, HI, USA
IND	Indianapolis, IN, USA
JFK	New York(Kennedy), NY, USA
KOA	Kona, Hawaii, HI, USA

LAS	Las Vegas(Intl), NV, USA
LHR	London(Heathrow), England, UK
LIH	Lihue, Kauai, HI, USA
LIR	Liberia International Airport, Costa Rica
MCI	Kansas City(Intl), MO, USA
MCO	Orlando(Intl), FL, USA
MEM	Memphis, TN, USA
MEX	Mexico City(Juarez Intl), Mexico
MIA	Miami(Intl), FL, USA
MSP	Minneapolis/St. Paul(Intl), MN, USA
MSY	New Orleans(Intl), LA, USA
MTY	Monterrey, Mexico
NRT	Tokyo(Narita), Japan
OAK	Oakland, CA, USA
OGG	Kahului, Maui, HI, USA
PDX	Portland, OR, USA
PHX	Phoenix(Intl), AZ, USA
PVG	Shanghai (Pu Dong Intl), China
PVR	Puerto Vallarta, Mexico
RDU	Raleigh/Durham, NC, USA
SAL	San Salvador, El Salvador
SAN	San Diego(Intl), CA, USA
SAT	San Antonio, TX, USA
SEA	Seattle/Tacoma(Intl), WA, USA
SFO	San Francisco(Intl), CA, USA
SJC	San Jose, CA, USA
SJD	Los Cabos, Mexico
SJO	San Jose(Santamaria), Costa Rica
SLC	Salt Lake City, UT, USA
SMF	Sacramento(Metro), CA, USA
SYD	Sydney(Intl), NS, Australia
TOW	Tow operation
TPA	Tampa(Intl), FL, USA
TUS	Tucson, AZ, USA
YEG	Edmonton(Intl), AB, Canada
YVR	Vancouver(Intl), BC, Canada
YYC	Calgary, AB, Canada
YYZ	Toronto(Pearson Intl), ON, Canada

Attachment 3.d.: List of Gates at Terminals 2 and 3 with Gate Gauges and Airplane Design Group (ADG) in August 2016

		Without Gate Dependency		With Gate Dependency	
Terminal	**Gate Number**	**Gate Gauge**	**ADG**	**Gate Gauge**	**ADG**
T2	21	A321	III	A340-600	V
T2	21B	B757-200	IV	Gate Closed	-
T2	23	A321	III	A340-600	V
T2	25	B737-900	III	B777-300	V
T2	27	B767	IV	Gate Closed	-
T2	28	B747-400	V	B747-400	V
T2	26	B747-400	V	B747-400	V
T2	24	A321	III	A340-600	V
T2	24A	B757-300	IV	Gate Closed	-
T2	22	B767-300	IV	B777-300	V
T3	39	A321	III	Gate Closed	-
T3	38B	B777-300	V	B777-300ER	V
T3	37B	B737-900W	III	B737-900W	III
T3	37A	B757-300	IV	B757-300	IV
T3	36	B737-900	III	B737-900	III
T3	35	B767-300	IV	Gate Closed	-
T3	34	B767-300	IV	B777-300ER	V
T3	33B	B737-900W	III	B737-900W	III
T3	33A	B737-900W	III	B737-900W	III
T3	32	B737-900W	III	B737-900W	III
T3	31B	B737-900W	III	Gate Closed	-
T3	31A	B737-900W	III	B777-300	V
T3	30	A321	III	Gate Closed	-
Source: Los Angeles World Airports, August 2016.					

Attachment 3.e.: Fleet Mix of Airlines Operating at Terminals 2 and 3 in August 2016

Airplane Design Group (ADG)	Aircraft Code	Aircraft Type
II	PL2	Pilatus PC-12
III	319	Airbus 319
III	320	Airbus 320
III	321	Airbus 321
III	737	Boeing 737-700
III	738	Boeing 737-800
III	M80	McDonnell Douglas MD-80
IV	757	Boeing 757
IV	763	Boeing 767-300
V	332	Airbus 330-200
V	788	Boeing 787-8
V	789	Boeing 787-9
V	77L	Boeing 777-200LR
V	77W	Boeing 777-300ER

Note: The published flight schedule for August 5, 2016 is representative of airline activity on a peak day in the peak month of August at LAX.

Source: Innovata, Inc., published flight schedule for August 5, 2016.

Attachment 3.f.: NBEG Calculations Associated with Figure C

Terminal	Gate Number	Gate Gauge	ADG	Wingspan	Divided by 118'
2	2.1	B777-300	V	199.8	1.7
2	2.2	Closed	n/a	n/a	0.0
2	2.3	B767-300	IV	156.2	1.3
2	2.4	B737-900W	III	117.4	1.0
2	2.5	B757-200	IV	125	1.1
2	2.6	Closed	n/a	n/a	0.0
2	2.7	B737-900W	III	117.4	1.0
2	2.8	B757-200	IV	125	1.1
2	2.9	Closed	n/a	n/a	0.0
2	2.10	B737-900W	III	117.4	1.0
2	2.11	B767-300	IV	156.2	1.3
2	2.12	Closed	n/a	n/a	0.0
2	2.13	B767-300	IV	156.2	1.3
3	3.1	B767-300	IV	156.2	1.3
3	3.2	Closed	n/a	n/a	0.0
3	3.3	B737-900W	III	117.4	1.0
3	3.4	B737-900W	III	117.4	1.0
3	3.5	B737-900W	III	117.4	1.0
3	3.6	B757-200	IV	125	1.1
3	3.7	Closed	n/a	n/a	0.0

Terminal	Gate Number	Gate Gauge	ADG	Wingspan	Divided by 118'
3	3.8	Closed	n/a	n/a	0.0
3	3.9	B757-200	IV	125	1.1
3	3.10	B737-900W	III	117.4	1.0
3	3.11	B737-900W	III	117.4	1.0
3	3.12	B737-900W	III	117.4	1.0
3	3.13	Closed	n/a	n/a	0.0
3	3.14	B777-300ER	V	212.6	1.8
				Total:	**22.1**

Attachment 3.g.: NBEG Calculations Associated with Figure D

Terminal	Gate Number	Gate Gauge	ADG	Wingspan	Divided by 118'
2	2.1	B777-300ER	V	212.6	1.8
2	2.2	Closed	n/a	n/a	0.0
2	2.3	B777-300ER	V	212.6	1.8
2	2.4	Closed	n/a	n/a	0.0
2	2.5	B757-200	IV	125	1.1
2	2.6	Closed	n/a	n/a	0.0
2	2.7	B737-900W	III	117.4	1.0
2	2.8	B757-200	IV	125	1.1
2	2.9	Closed	n/a	n/a	0.0
2	2.10	Closed	n/a	n/a	0.0
2	2.11	B777-300ER	V	212.6	1.8
2	2.12	Closed	n/a	n/a	0.0
2	2.13	B777-300ER	V	212.6	1.8
3	3.1	B777-300ER	V	212.6	1.8
3	3.2	Closed	n/a	n/a	0.0
3	3.3	B737-900W	III	117.4	1.0
3	3.4	B737-900W	III	117.4	1.0
3	3.5	B767-300	IV	156.2	1.3
3	3.6	Closed	n/a	n/a	0.0
3	3.7	B737-900W	III	117.4	1.0
3	3.8	B737-900W	III	117.4	1.0
3	3.9	B767-300	IV	156.2	1.3
3	3.10	Closed	n/a	n/a	0.0
3	3.11	B737-900W	III	117.4	1.0
3	3.12	B737-900W	III	117.4	1.0
3	3.13	Closed	n/a	n/a	0.0
3	3.14	B777-300ER	V	212.6	1.8
				Total:	**22.6**