Volume 3 Responses to Comments and Corrections and Additions to the Draft EIR

Final Environmental Impact Report (Final EIR) LOS ANGELES INTERNATIONAL AIRPORT (LAX) UNITED AIRLINES EAST AIRCRAFT MAINTENANCE AND GROUND SUPPORT EQUIPMENT PROJECT

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[State Clearinghouse No. 2017121019]

City of Los Angeles Los Angeles World Airports Los Angeles City File No. EIR-18-012-AD October 2018

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Final Environmental Impact Report (Final EIR)

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[State Clearinghouse No. 2017121019]

City of Los Angeles Los Angeles World Airports Los Angeles City File No. EIR-18-012-AD October 2018

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Attachment 1 Original Comment Letters on the UAL East Aircraft Maintenance and GSE Project

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PREFACE

This document, in conjunction with the previously prepared documents described below, constitutes the Final Environmental Impact Report (Final EIR) for the United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project at Los Angeles International Airport (LAX). As further described in the Introduction of this document, the proposed project would consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX, which would increase efficiency and effectiveness. The project would redevelop an approximately 35-acre site in the eastern portion of the airport with a new 411,000 square-foot facility. The project would not affect the volume or basic nature of UAL's existing maintenance operations at LAX. The proposed project would not increase flights or aircraft operations, or affect terminals, the number of gates at LAX, gate frontage, taxiways, or runways.

In accordance with the California Environmental Quality Act (CEQA), Los Angeles World Airports (LAWA), as Lead Agency, has completed an EIR to disclose the environmental impacts associated with the UAL East Aircraft Maintenance and GSE Project.

LAWA circulated a Draft EIR regarding the proposed project, received public and agency comments on the Draft EIR, and prepared written responses to those comments – all of which provides the basis for this Final EIR.

Pursuant to CEQA Guidelines Section 15132, a Final EIR consists of:

- a) The Draft EIR or a revision of the draft.
- b) Comments and recommendations received on the Draft EIR either verbatim or in summary.
- c) A list of persons, organizations, and public agencies commenting on the Draft EIR.
- d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.
- e) Any other information added by the Lead Agency.

Accordingly, the Final EIR for the UAL East Aircraft Maintenance and GSE Project consists of two components, as follows:

Component 1: Draft EIR and Appendices

The Draft EIR, including appendices, was distributed for public review and comment from June 28, 2018 to August 13, 2018. A public workshop was held during the Draft EIR comment period on July 31, 2018.

Volume 1 – Draft EIR Main Document and Appendix A: Volume 1 of the Final EIR includes the Draft EIR Main Document and Appendix A, which contains the Notice of Preparation (NOP), Initial Study, Scoping Meeting Materials, and NOP Comments.

Volume 2 – Draft EIR Technical Appendices: Volume 2 of the Final EIR includes the remaining Draft EIR Technical Appendices, including the following:

Appendix B Air Quality, Human Health Risk Assessment, Greenhouse Gas Emissions, and Energy

Appendix C Historic Resources Technical Report

Appendix D Transportation/Traffic

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Component 2: Responses to Comments and Corrections and Additions to the Draft EIR

Volume 3 – Responses to Comments and Corrections and Additions to the Draft EIR: The second part of the Final EIR consists of a compilation of the comments received on the Draft EIR, the written responses prepared by LAWA to those comments, and corrections and additions to the Draft EIR. This volume includes an index (i.e., list) of agencies and individuals that commented on the Draft EIR. This volume also includes Attachment 1, which consists of a copy of the comment letters on the Draft EIR in their original form (i.e., photocopies of comment letters).

All of the documents described above, comprising the Final EIR for the UAL East Aircraft Maintenance and GSE Project, are available for public review at LAWA's Administration Offices, One World Way, Room 218, Los Angeles, California 90045. The Final EIR is also available online at https://www.lawa.org/en/lawa-our-lax/environmental-documents/current-projects/united-airlines-east-aircraft-maintenance#EIR.

1. INTRODUCTION AND INDEX

1.1 Introduction

In compliance with the California Environmental Quality Act (CEQA), Los Angeles World Airports (LAWA) has completed this Final Environmental Impact Report (Final EIR) for the United Airlines (UAL) East Aircraft Maintenance and Ground Support Equipment (GSE) Project (proposed project) at Los Angeles International Airport (LAX). As described in the preface of this document, the Final EIR for the proposed project consists of two components, with the first component consisting of Volumes 1 and 2 – Draft EIR and associated appendices, and the second component being Volume 3 – Responses to Comments and Corrections and Additions to the Draft EIR. This document, Volume 3, constitutes the second component of the Final EIR.

Draft EIR

A detailed description of the proposed project is provided in Volume 1 of the EIR (see Chapter 2 in the Draft EIR-Main Document). On June 28, 2018, LAWA published a Draft EIR for the UAL East Aircraft Maintenance and GSE Project. In accordance with CEQA, the Draft EIR was circulated for public review for more than 45 days, with the review period closing on August 13, 2018 at 5:00 p.m.

As explained in more detail in Volume 1 of the EIR, the proposed project would consolidate and modernize existing UAL aircraft maintenance and GSE facilities at LAX, which, in turn, would allow for more efficient and effective maintenance of existing aircraft and GSE at the airport. Currently UAL performs maintenance in two areas at LAX: West Maintenance Facility (also known as the United Airlines Maintenance Facility, and formerly known as the Continental Airlines Aircraft Maintenance Hangar) and East Maintenance Facility (also known as the United Airlines Center or MOC). The West Maintenance Facility is located in the western portion of LAX, south of World Way West approximately 0.7 mile east of Pershing Drive, and the East Maintenance Facility is located south of Century Boulevard, approximately 0.45 mile east of Sepulveda Boulevard. The distance between the two maintenance facilities is approximately 1.6 miles. Both facilities have aircraft service areas, which include enclosed hangars at the West Maintenance Facility, aircraft parking spots, GSE bays and shops, maintenance and inspection rooms and functions, and office and storage space.

UAL proposes to redevelop its existing eastern facility to consolidate all of UAL's aircraft and GSE maintenance activities. Following project implementation, it is reasonably foreseeable that UAL's West Maintenance Facility would continue to be used for aircraft and/or GSE maintenance by another airline currently conducting such activities at LAX in constrained or reduced facilities, and would not represent a new use or an increase in such activity. Any proposed reuse of the West Maintenance Facility may be subject to its own environmental review and documentation, as appropriate under applicable law.

The proposed project would redevelop an approximately 35-acre site in the eastern portion of the airport operations area (AOA). With the exception of a Quonset Hut located near the northern boundary of the project site and Avion Drive (south of Century Boulevard), all the buildings associated with the existing East Maintenance Facility would be demolished. LAWA is planning to relocate the Quonset Hut independently of the proposed project. This relocation is planned as part of LAWA's ongoing management of historic resources at LAX.

Although the portion of UAL's current aircraft and GSE maintenance operations that occurs at the West Maintenance Facility would be consolidated with operations located on the east side of the airport, the volume and basic nature of UAL's existing maintenance operations at LAX would not change or increase. Implementation of the project would simply combine/consolidate existing maintenance operations from two areas into one. The consolidation would alter on- and off-airport vehicular movements, as well as aircraft movements on the airfield. Specifically, employees that currently use the surrounding roadway network to drive to the West Maintenance Facility, including Imperial Highway, Pershing Drive, and Westchester Parkway, would instead drive to the East Maintenance Facility, which would be accessed via Century Boulevard or a generally parallel network of side roads located south of Century Boulevard. Similarly, on the airfield, GSE and aircraft that currently travel on taxiways and taxilanes to access the West Maintenance Facility would instead travel to the East Maintenance Facility. The proposed project would not increase flights and/or aircraft operations at LAX compared to existing airfield conditions and would not affect terminals, the number of gates at LAX, gate frontage, taxiways, or runways. Construction of the proposed project would be phased over approximately 22 months (one year and ten months), beginning with the demolition of existing facilities in the East Maintenance Facility lease area, projected to commence in the fourth quarter of 2018; new construction would extend to late 2020.

Final EIR

In accordance with State CEQA Guidelines Section 15088, LAWA prepared responses to all environmental comments received on the Draft EIR. As required by the State CEQA Guidelines, the focus of the responses to comments is on "the disposition of significant environmental issues raised." State CEQA Guidelines Section 15088(c). Detailed responses are not provided to comments on the merits of the UAL East Aircraft Maintenance and GSE Project or on other topics that do not relate to environmental issues. As discussed below, all comments received on the Draft EIR will be forwarded, as part of this Final EIR, to the decision-makers for their consideration prior to taking any action on the UAL East Aircraft Maintenance and GSE Project.

This document, which is the second component of the Final EIR, presents the comments received during the public review period for the Draft EIR and provides written responses to those comments. A total of 7 comment letters were received during the public review period, and one comment letter was received after the close of the public review period. The index presented at the end of this chapter lists the agencies, organizations, and individuals that submitted comments on the Draft EIR. Copies of all comment letters received are included in Attachment 1 of this document. Chapter 2 of this document presents, on a letter-by-letter basis, each comment, which is then followed immediately by a response, for all comments received during the review period for the Draft EIR (June 28, 2018 through August 13, 2018). The comments and responses are organized and grouped together into categories based on the affiliation of the commenter. The comments are presented in the following order: state agencies, regional agencies, local agencies, and public comments (i.e., letters from private citizens, organizations, etc.). Chapter 3 of this document provides corrections and additions to information presented in the Draft EIR.

Together with the Draft EIR, the responses to comments, along with corrections and additions to the Draft EIR, and list of commenters, constitute the Final EIR. Pursuant to CEQA, the Final EIR is not circulated for another round of comments and responses. The Final EIR will be presented to the decision-makers for their use in considering the UAL East Aircraft Maintenance and GSE Project.

1.2 Index of Comment Letters

An alphanumeric index system is used to identify each comment and response, and is keyed to each letter and the individual comments therein. The following are the prefix codes used for categorizing the comment letter types:

Letter ID Prefix	Description	
AS	State Agency	
AR	Regional Agency	
AL	Local Agency	
PC	Public Comments	

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

Chapter 2 provides individual comments and responses, presented on a letter-by-letter basis. Each comment is typed exactly as it appears in the original comment letter. No corrections to typographical errors or other edits to the original comments were made. Immediately following each typed comment is a written response. A copy of each original comment letter is provided in Attachment 1 of Volume 3 of this Final EIR.

Table 1-1 Index by Letter Identification (ID) Number					
Letter ID	Commenter	Affiliation/Agency	Date		
UAL-AS01	Edmonson, Miya	California Department of Transportation (Caltrans)	8/13/2018		
UAL-AS02	Morgan, Scott	State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	8/14/2018		
UAL-AS03	Morgan, Scott	State of California, Governor's Office of Planning and Research, State Clearinghouse and Planning Unit	8/16/2018		
UAL-AR01	Dalbeck, Robert	South Coast Air Quality Management District	8/10/2018		
UAL-AR02	Dalbeck, Robert	South Coast Air Quality Management District	8/28/2018 ¹		
UAL-AL01	Petta, Joseph	Shute, Mihaly & Weinberger LLP (City of El Segundo)	8/13/2018		
UAL-PC01	Kaloshian, Nicole	WSCC	7/31/2018		
UAL-PC02	Peery, John E.	Mercury Air Cargo, Inc.	8/3/2018		
^{1.} Received after close of public comment period.					

Following is the index that organizes comment letters by letter identification number.

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2. COMMENTS AND RESPONSES

The following provides the responses to comments received on the UAL East Aircraft Maintenance and GSE Project Draft EIR.

UAL-AS01 Edmonson, Miya California Department of Transportation 8/13/2018

UAL-AS01-1

Comment: Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would redevelop a 35-acre site in eastern portion of the airport with a new 411,000 sq. ft. facility. The project would not affect the volume or basic nature of United Airlines' existing maintenance operations at LAX.

The nearest State facilities to the proposed project are Interstate 105 and 405. Based on review of the Draft Environmental Impact Report, Caltrans has the following comments:

The document list past, present, and probable future projects producing related or cumulative impacts. Decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future.

Response: Evaluation of cumulative traffic impacts during construction and operation of the proposed project were addressed in Section 4.4.1, Construction Transportation/Traffic, and Section 4.4.2, Operational Transportation/Traffic, of the Draft EIR, respectively.

As discussed in Section 4.4.1.2.4 of the Draft EIR, cumulative traffic conditions during construction of the proposed project were assessed for the period during the overall proposed project construction program when the cumulative construction traffic associated with other LAX development programs would be greatest. This peak cumulative period was estimated to occur during October 2019. As stated in Section 4.4.1.7.2 of the Draft EIR, five intersections would be significantly impacted during the cumulative peak construction period (October 2019). Of these five intersections, the proposed project's contribution would be cumulatively considerable at the following three intersections: Aviation Boulevard and Century Boulevard (Intersection #1), Imperial Highway and Aviation Boulevard (Intersection #2), and Imperial Highway and I-105 Ramp (Intersection #4). The proposed project's contribution to significant cumulative impacts generated at each of these intersections would be due to haul truck traffic transferring materials to and from the project site during the a.m. and p.m. peak hours. Restricting haul truck trips during the a.m. and p.m. peak hours would eliminate the project-related cumulatively considerable contribution to significant cumulative impacts at all of the significantly impacted intersections.

As indicated in Section 4.4.1.8 of the Draft EIR, the following mitigation measure is proposed to reduce the proposed project's contribution to cumulatively significant construction traffic impacts.

MM-ST (UAL)-1. Designated Truck Delivery Hours. Truck deliveries of bulk materials (such as aggregate, bulk cement, dirt, etc.) to the project site, and hauling of material from the project site, shall be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes. Peak commuter traffic periods are between 7:00 a.m. to 9:00 a.m. and 4:30 p.m. to 6:30 p.m. Monday through Friday. Any deviations to these requirements shall be approved in writing by the CALM Team prior to actual site deliveries.

As stated in Section 4.4.1.9 of the Draft EIR, with implementation of Mitigation Measure MM-ST (UAL)-1, the proposed project's contribution to impacts at each intersection (Intersections #1, #2 and #4) would be reduced; with mitigation, the impact would not be cumulatively considerable (i.e., it would be less than significant).

As discussed in Section 4.4.2.2.4 of the Draft EIR, cumulative traffic during project operation were assessed for the periods of Opening Day (December 2020) and Plus Five Years (2025). As stated in Section 4.4.2.7.2 of the Draft EIR, operational traffic impacts associated with the proposed project would be less than significant and would not be cumulatively considerable; therefore, no mitigation measures are required.

UAL-AS01-2

- **Comment:** 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.
- **Response:** As discussed in Section 4.4.1.3.5 on page 4.4-15 of the Draft EIR, LAWA has established the Coordination and Logistic Management (CALM) Team to monitor and coordinate construction traffic control needs. As stated in Section 2.5.1 of the Draft EIR, no lane or road closures of public roadways (including Sepulveda Boulevard) would be required for construction of the LAX UAL East Aircraft Maintenance and GSE Project. In the unlikely event that detours or lane closures of Sepulveda Boulevard are required for construction of the project, the CALM Team would consult with Caltrans, as appropriate.

UAL-AS01-3

- **Comment:** In addition, the CALM team should be prepared to mitigate cumulative construction traffic if the previously mentioned projects are being developed simultaneously.
- **Response:** Please see Response to Comment UAL-AS01-1 above.
- UAL-AS01-4
- **Comment:** In addition, oversized construction truck deliveries expected to utilize State Highways will need a transportation permit and possible a California Highway Patrol (CHP) escort.
- **Response:** Contractors operating at LAX are required to comply with all applicable regulatory requirements, including, but not limited to, transportation-related requirements. LAWA's *Design and Construction Handbook* for projects occurring on LAWA property requires that, in addition to LAWA's specific requirements, contractors must comply "...with other applicable permits, approvals, requirements, rules and regulations of other agencies with jurisdiction over the work of this contract."¹ Therefore, the contractor will be required to comply with applicable Caltrans permitting requirements.
 - ¹ City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Design and Construction Handbook: Design Standards and Guide Specifications Division 1, General Requirements*, Section 01 35 43 C., July 2017. Available: https://www.lawa.org/-/media/lawa-web/tenants411/file/division-01-july-2017.ashx?la=en&hash=573DEC6E2A9501A7831B7D636A1BAB2F1D639AD3.

UAL-AS01-5

Comment: 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.

Response: Please see Response to Comment UAL-AS01-1 above. As indicated therein, LAWA would implement Mitigation Measure MM-ST (UAL)-1, Designated Truck Delivery Hours, which requires that truck deliveries of bulk materials (such as aggregate, bulk cement, dirt, etc.) to the project site, and hauling of material from the project site, be scheduled during off-peak hours to avoid the peak commuter traffic periods on designated haul routes. Moreover, as indicated in Section 4.4.1.1, deliveries to the steel laydown area, and between the laydown area and the project site, would occur outside of the morning and evening commuter peak hours. Peak commuter traffic periods are between 7:00 a.m. to 9:00 a.m. and 4:30 p.m. to 6:30 p.m. Monday through Friday. Any deviations to these requirements are required to be approved in writing by the CALM Team prior to actual site deliveries.

UAL-AS01-6

- **Comment:** 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.
- **Response:** In accordance with SCAQMD Rule 403 Fugitive Dust Control Measure 1E, as listed in Table 3, Contingency Control Measure for Large Operations, of the rule, construction contractors will be required to cover all haul trucks delivering or hauling away dirt, sand, soil, or other loose materials. In addition, all trucks operating on public highways are subject to California Vehicle Code Section 23114, which requires the proper containment of aggregate including sand, dirt, gravel, and other similar materials. In addition, construction contractors will be required to comply with LAWA's *Design and Construction Handbook*, which requires contractors to full requirements of various agencies, including SCAQMD.¹
 - ¹ City of Los Angeles, Los Angeles World Airports, *Los Angeles World Airports Design and Construction Handbook: Planning Permitting Agencies and the FAA*, Section 1.6.B.3., October 2017. Available: https://www.lawa.org/-/media/lawa-web/tenants411/file/09-permitting-agencies-and-the-faa-october-2017.ashx?la=en&hash=528E962EDD991E6767349812626BAE39A062A702.

UAL-AS02 Morgan, Scott State of California State Clearinghouse 8/14/2018

UAL-AR02-1

Comment: The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on August 13, 2018, 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.

Response: A comment letter from the State of California, Department of Transportation (Caltrans) was sent directly to LAWA and was received on August 13, 2018. Caltrans' comment letter is identified in this Final EIR as UAL-AS01. It should be noted that the State Clearinghouse sent a second letter, dated August 16, 2018, transmitting the Caltrans letter (see Response to Comment UAL-AS03-1 below).

UAL-AS03 Morgan, Scott State of California State Clearinghouse

8/16/2018

UAL-AR03-1

Comment: The enclosed comment(s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on August 13, 2018. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2017121019) when contacting this office.

Response: This comment is noted. The comment letter attached to the State Clearinghouse' August 16, 2018 letter is a duplicate of the August 13, 2018 comment letter from Caltrans sent directly to LAWA and received on August 13, 2018. Caltrans' August 13, 2018 comment letter is identified in this Final EIR as UAL-AS01. In accordance with Section 15088 of the State CEQA Guidelines, as part of this Final EIR, LAWA prepared responses to all comments received on the UAL East Aircraft Maintenance and GSE Project Draft EIR, including all comments received from Caltrans.

UAL-AR01 Dalbeck, Robert South Coast Air Quality Management District 8/10/2018

- UAL-AR01-1
- **Comment:** The SCAQMD has received the DEIR for the LAX United Airlines Aircraft Maintenance and Ground Support Equipment Project and is currently reviewing it. The public comment period ends on Monday, August 13th. The SCAQMD staff appreciates the opportunity to comment on the above-mentioned document but we will be unable to send the comment letter within the public comment period. Therefore, we are requesting a two-day extension to submit our comments on August 15th.
- **Response:** Following receipt of this comment, LAWA replied to SCAQMD that it would review and respond to a late comment letter from SCAQMD pursuant to its discretion under the CEQA Guidelines. SCAQMD submitted a subsequent comment, dated August 28, 2018, stating that it had no comments on the Draft EIR. Please see Comment Letter UAL-AR02.

UAL-AR02 Dalbeck, Robert South Coast Air Quality Management District 8/28/2018

- UAL-AR02-1
- **Comment:** Good Morning! I received your voicemail. We really appreciate your willingness to extend the comment period. After further review, the SCAQMD has no comments on the LAX United Airlines Aircraft Maintenance and Ground Support Equipment Project DEIR. Thank you very much.
- **Response:** This comment is noted and is hereby part of the Final EIR and will be forwarded to the decision-makers for their consideration prior to taking any action on the UAL East Aircraft Maintenance and GSE Project. As SCAQMD has no comments on the Draft EIR, no further response is required.

UAL-AL01 Petta, Joseph Shute, Mihaly & Weinberger LLP (City of El Segundo)

UAL-AL01-1

Comment: On behalf of the City of El Segundo (the "City"), thank you for the opportunity to review the draft environmental impact report ("DEIR") for the United Airlines East Aircraft Maintenance and Ground Support Equipment Project ("Project"). The City appreciates that, for the most part, the Project would reduce the footprint of United's aircraft maintenance and ground service equipment operations, and move existing high- power aircraft engine run-ups farther from the City's closest receptors. The City also appreciates that the DEIR addresses some of the City's concerns about adequate parking for workers during construction, and changes to on-airfield aircraft movement due to the Project. Nonetheless, due to longstanding issues around noise and traffic impacts originating on the southern airfield and/or directed toward El Segundo, the City remains concerned about the adequacy of the DEIR's analysis. Importantly, the City strongly opposes the adoption of Alternative 2 to the Project, which would expand and intensify maintenance operations at the western lease area instead.¹

¹ In addition to these comments, we incorporate by reference herein the City's January 8, 2018 comments on the Notice of Preparation and Initial Study ("NOP/IS") for the Project.

Response: This comment is noted, including the commenter's opposition to Alternative 2, and is hereby part of the Final EIR and will be forwarded to the decision-makers for their consideration prior to taking any action on the UAL East Aircraft Maintenance and GSE Project. The commenter also references "longstanding issues around noise and traffic impacts." The commenter appears to be referencing existing environmental conditions, which are not impacts of the proposed project. (CEQA Guidelines § 15125(a) and 15126.2(a).)

The commenter also states that they "incorporate by reference herein the City's January 8, 2018 comments on the Notice of Preparation and Initial Study ("NOP/IS") for the Project." The commenter acknowledges in their letter on the Draft EIR that "[t]he City also appreciates that the DEIR addresses some of the City's concerns about adequate parking for workers during construction, and changes to on-airfield aircraft movement due to the Project." However, the commenter does not explain which comments they believe to still be at issue from their NOP/IS comments, other than those issues specifically raised in their August 13, 2018 letter. Please also see Responses to Comments UAL-AL01-2 through UAL-AL01-9 below. A response to the City of El Segundo's January 8, 2018 comments on the NOP/IS for the UAL East Aircraft Maintenance and GSE Project is provided in Response to Comment UAL-AL01-9.

UAL-AL01-2

Comment: I. Future Maintenance Use of United's West Maintenance Lease Area Was Improperly Excluded from This EIR.

The DEIR discloses that continued use of United's west maintenance area by another airline is "reasonably foreseeable."² CEQA therefore requires that this use be analyzed in the DEIR as part of the operation of the Project. Although the DEIR claims to address continued used of the west facility for maintenance in the DEIR's cumulative impacts analysis, this analysis appears nowhere in the DEIR. Instead, the DEIR summarily concludes that the Project would have less-than-significant cumulative operational impacts based just on the operations at the eastern lease. This violates CEQA. Confusingly, the DEIR at the same time assumes complete termination of use of United's western lease area in order to conclude that any impacts from increased operations at the Project site would be netted out. Moreover, the DEIR is equivocal about whether future use of the west maintenance area by a different airline would even be subject to CEQA. Clearly, it is. The DEIR may not conclude that draw-down of the west lease area operations would net out any impacts from operation of the Project site without committing to no future maintenance use absent environmental review.

² With the adjacent West Aircraft Maintenance Area ("WAMA") in use, continued use of United's western lease for maintenance operations would concentrate more aircraft maintenance and parking in the western part of the airport than the Master Plan allows. See City's January 8, 2018 comments on the NOP/IS.

Response: The commenter selectively quotes language from the Draft EIR, without providing a full or accurate statement regarding the conclusions and analysis contained therein. More specifically, Section 2.1 of the Draft EIR explains that UAL proposed to redevelop its existing eastern facility to consolidate all of UAL's aircraft and GSE maintenance activities and that, following implementation of the proposed project, the West Maintenance Facility would remain vacant until such time as LAWA leases the facility to a tenant or proposes redevelopment of the site, subject to its own environmental review, as appropriate under applicable law. Reasonably foreseeable uses of the West Maintenance Facility are discussed in Chapter 3, *Overview of Project Setting*.

Chapter 3 of the Draft EIR goes on to explain that changes to aircraft and GSE maintenance facilities at LAX as a whole over the last thirteen years "will result in a net decrease in square footage of facilities dedicated to aircraft and GSE maintenance at LAX of approximately 190,000 square feet".¹ It also explains that "[f]ollowing project implementation, it is reasonably foreseeable that UAL's West Maintenance Facility would continue to be used for aircraft and/or GSE maintenance by another airline currently conducting such activities at LAX in constrained or reduced facilities, and would not represent a new use or an increase in such activity."

Contrary to the commenter's statement, future use of the West Maintenance Facility was not improperly excluded from the Draft EIR. Page 3-8 in Chapter 3, Overview of Project Setting, of the Draft EIR acknowledges that it is reasonably foreseeable that UAL's West Maintenance Facility would continue to be used for aircraft and/or GSE maintenance by another airline currently conducting such activities at LAX in constrained or reduced facilities, and is not expected to increase airport-wide maintenance activities. As stated in the Draft EIR, LAWA made the reasonable assumption that "UAL's West Maintenance Facility would continue to be used for aircraft and/or GSE maintenance by another airline currently conducting such activities at LAX in constrained or reduced facilities, and would not represent a new use or an increase in such activity." These constraints are due in part to the net cumulative decrease in square footage of aircraft and GSE maintenance facilities. The commercial airlines at the airport do not fly aircraft to LAX for the sole purpose of performing maintenance. Rather, the airlines perform what is referred to as "line maintenance," which consists of routine, scheduled maintenance checks and other routine maintenance activities on aircraft that have flown to LAX as part of normal flight operations. These types of checks normally occur over the course of a few hours, usually overnight, when the aircraft are not in service. Therefore, the fact that the existing UAL West Maintenance Facility might be reused by another operator does not mean that the proposed project would induce growth in aircraft maintenance activities. As stated in Chapter 2, Project Description, of the Draft EIR, the purpose of the proposed project is to consolidate and modernize UAL's existing aircraft and GSE facilities at LAX into a single

location on the site of the East Maintenance Facility. As part of this consolidation, UAL would relocate its operations at the West Maintenance Facility. There is no specific future use of the West Maintenance Facility proposed at this time; therefore, the EIR made a reasonable assumption, as explained above. LAWA will make the determination as to the appropriate environmental review if and when any future reuse is proposed; this determination will be made in full compliance with CEQA, including the definition of a project that is subject to CEQA (California Public Resources Code, Section 21065).

With respect to the evaluation of cumulative impacts, as stated on page 3-8 in Chapter 3, Overview of Project Setting, of the Draft EIR, many changes to maintenance facilities have occurred since initiation of the LAX modernization program, including the removal or planned removal of 840,000 square feet of building area, only a portion of which has been replaced. As a result of these changes, airlines have had to make accommodations to enable them to continue to perform necessary aircraft and GSE maintenance at LAX that is required for their continued operations. If the West Maintenance Facility were to become available due to the relocation of UAL's maintenance activities to the proposed project site, it is reasonably foreseeable that another airline (and/or GSE operator) would be interested in using the West Maintenance Facility, particularly in light of the fact that many airlines and GSE operators are currently conducting maintenance at LAX in facilities that have been constrained or reduced in size since initiation of the LAX modernization program. Moreover, it is reasonable to assume that such future use would not represent a new or an increase in aircraft or GSE maintenance activities at LAX; rather, such use would simply provide additional space for another airline (or GSE operator) to conduct their current activities in a less constrained setting.

The commenter also alleges in a footnote that "[w]ith the adjacent West Aircraft Maintenance Area ("WAMA") in use, continued use of United's western lease for maintenance operations would concentrate more aircraft maintenance and parking in the western part of the airport than the Master Plan allows. See City's January 8, 2018 comments on the NOP/IS."² As an initial matter, both the WAMA (a separate project approved in 2014) and the existing UAL West Maintenance Facility are currently operating at LAX (i.e., they represent baseline conditions). Further, the LAX Master Plan assumed continued use of the aircraft maintenance facility on the west side of the airport following implementation of the LAX Master Plan, including the portion that is currently used by UAL for aircraft maintenance purposes. Specifically, Section 2.6.1 of the Final LAX Master Plan states "[t]wo existing facilities on the west side of the airport and south of World Way West would be retained". The maintenance facility is illustrated on Figure 2.6-1 of the LAX Master Plan as "Aircraft Maintenance Hangars."³ Similarly, Figure F3-14 of the LAX Master Plan Final EIR shows the west maintenance facility as an existing maintenance facility that would remain on the airport.⁴ Finally, the Federal Aviation Administration (FAA) reviewed the WAMA project in 2014 and concluded that "the proposed WAMA project is largely equivalent to the LAX Master Plan aircraft maintenance area, as presented in the January 2005 Final EIR."⁵ The Airport Layout Plan for LAX was subsequently amended to specifically show the WAMA as approved by the FAA.⁶ Thus, there is no merit to the commenter's suggestion that continued use of the WAMA and the West Maintenance Facility would be inconsistent with current airport planning policies.

¹ Specifically, as described on page 3-8 of the Draft EIR, 840,000 square feet of building area used for aircraft and/or GSE maintenance has been removed or is planned for removal at LAX since initiation of the LAX modernization program. A total of approximately 650,000 square feet of building area for maintenance uses has been replaced, resulting in a net decrease in square footage of facilities dedicated to aircraft and GSE

maintenance at LAX of approximately 190,000 square feet (840,000 sf - 650,000 sf = 190,000 sf). These numbers do not include the current UAL West Maintenance Facility.

- ² The commenter's January 8, 2018 NOP/IS comments, in turn, reference their prior December 2, 2013 Draft EIR comments on the WAMA project (approved in 2014), asserting that "[t]he WAMA is located on a site that the Master Plan identifies for employee parking, yet LAWA has not amended the Master Plan to reflect the change in use, against El Segundo's urging, WAMA DEIR comments at 8. Continued use of United's western lease for maintenance operations would concentrate more aircraft maintenance and parking in this part of the airport than the Master Plan allows." LAWA prepared detailed responses to these comments. See City of Los Angeles, Los Angeles World Airports, *Final Environmental Impact Report for Los Angeles International Airport (LAX) West Aircraft Maintenance Area Project*, (SCH 2012091037), February 2014. Responses to Comments WAMA-AL00001-4 and WAMA-AL00001-40. Available: https://www.lawa.org/en/lawa-ourlax/environmental-documents/documents-certified/west-aircraft-maintenance-area.
- ³ City of Los Angeles, Los Angeles World Airports, Final LAX Master Plan: Taking Flight for a Better Future, Section 2.6, Ancillary Facilities – Alternative D, April 2004. Available: https://www.lawa.org/-/media/lawaweb/lawa-our-lax/2004-lax-masterplan/015maindocumentch206.ashx?la=en&hash=6FDA9E4AEA17DEE9414ACA6364AAA8746FD056E9.
- ⁴ City of Los Angeles, Final Environmental Impact Report for Los Angeles International Airport (LAX) Proposed Master Plan Improvements, (SCH 1997061047), Chapter 3 – Alternatives (Including Proposed Action), April 2004. Available: https://www.lawa.org/en/lawa-our-lax/environmental-documents/documentscertified/2004-lax-master-plan-program/final-environmental-impact-report-feir.
- ⁵ U.S. Department of Transportation, Federal Aviation Administration, Final Written Reevaluation and Record of Decision of FAA's January 2005 Final Environmental Impact Statement and May 20, 2005 Record of Decision – Proposed West Aircraft Maintenance Area West of Taxiway AA. Available: https://www.lawa.org/en/lawaour-lax/environmental-documents/documents-certified/west-aircraft-maintenance-area.
- ⁶ City of Los Angeles, Los Angeles World Airports, *Los Angeles International Airport (LAX) Airport Layout Plan*, approved by the Federal Aviation Administration on November 8, 2016.

UAL-AL01-3

- **Comment:** The DEIR takes a similarly flawed approach in its discussion of growth inducing impacts. The DEIR states that because the Project would not increase existing maintenance operations, the Project would not induce growth. This ignores the DEIR's admission that future maintenance use of the west lease area is "reasonably foreseeable." Use of the western lease area by another airline would remove a constraint on existing maintenance operations, thereby inducing growth. The DEIR must acknowledge this fact, and commit to analyzing the related impacts.
- **Response:** Please see Response UAL-AL01-2, which explains that the commenter has provided an incomplete overview of the Draft EIR's discussion and analysis of the reuse of the existing UAL West Maintenance Facility. As stated above, the Draft EIR made the reasonable assumption that the existing UAL West Maintenance Facility would be used for maintenance by another airline currently conducting such activities at LAX in a constrained manner. As stated on page 3-8 in Chapter 3, Overview of Project Setting, of the Draft EIR, many changes to maintenance facilities have occurred since initiation of the LAX modernization program, including the removal of building area used for maintenance, only a portion of which has been replaced. As a result of these changes, airlines have had to make accommodations to enable them to continue to perform necessary aircraft and GSE maintenance at LAX that is required for their continued operations. Additionally, commercial airlines at the airport do not fly aircraft to LAX for the sole purpose of performing maintenance. Rather, the airlines perform what is referred to as "line maintenance," which consists of routine, scheduled maintenance checks and other routine maintenance activities on aircraft that have flown to LAX as part of normal flight operations. These types of checks normally occur over the course of a few hours, usually overnight,

when the aircraft are not in service. Removing constraints on this type of incidental maintenance activity would have no effect on the total amount of maintenance performed at LAX. For these reasons, it is reasonable to assume that future use of the West Maintenance Facility would simply provide additional space for another airline (or GSE operator) to conduct existing activities in a less constrained setting. Therefore, there is no evidence that the proposed project would induce growth in aircraft maintenance activities.

UAL-AL01-4

- **Comment:** The DEIR also states that the Project would not increase passenger or gate capacity. To justify this assertion, LAWA must make a clear commitment that United's updated lease will prohibit passenger loading/unloading at the Project site. The DEIR should state what the Project's aircraft parking spots will be used for (e.g., active maintenance, remain overnight/remain all day aircraft parking, cargo loading/unloading), and provide an enforceable commitment that parking spaces will be used only for these purposes.³
 - ³ The DEIR assumes a total of 22 aircraft parking spaces at Project site, yet it appears the site could actually accommodate at least 26 spaces—not including any "double parking" that the DEIR discloses could occur. The lease and DEIR either need to include a cap on the number of parking spaces allowed, or else analyze the highest possible number of aircraft that could be maintained at the site at once.
- **Response:** The proposed project site is currently used for aircraft and GSE maintenance, and remain overnight/remain all day (RON/RAD) aircraft parking. The project site would continue to be used for these purposes with implementation of the proposed project. No regularly scheduled commercial flight activity, including passenger loading and unloading, would occur on the project site. Moreover, no cargo loading/unloading would occur on the project site. With regard to the commenter's footnote 3, the Draft EIR made reasonable assumptions, as permitted by CEQA.

UAL-AL01-5

Comment: II. The DEIR Must Fully Analyze the Noise Impacts of All Engine Run-ups, and Disclose the Probable Location of Any Off-Site Engine Run-ups.

The DEIR states that the Project will include a new blast fence for high-power engine ground run-ups, which presently occur at the western maintenance facility but not at the eastern facility. Although the DEIR states that conducting ground run-ups at the Project site would move these operations farther away from sensitive receptors in El Segundo, the DEIR still must accurately evaluate any associated noise impacts, which must include a single event noise analysis.

However, the DEIR omits any analysis of noise from maintenance operations. The Project would enable 200 high power engine run-ups per year, approximately 20 of which would likely occur somewhere other than at the Project site due to adverse wind conditions. The DEIR does not include any noise analysis of these run-ups, or even disclose where these 20 annual run-ups would occur. CEQA requires such disclosure and analysis.

Response: Contrary to the assertions in the comment, the Draft EIR does not "omit any analysis of noise from maintenance operations." Page 1-1 of the Draft EIR expressly states that "LAWA determined that impacts related to...noise...would be less than significant through the analysis in the Initial Study (see Appendix A)." The City of El Segundo previously reviewed this analysis, as shown by their NOP/IS comments related to noise. (See Comment UAL-AL01-9.) Including the operational noise analysis as an appendix to the Draft EIR is fully consistent with CEQA. (See CEQA Guidelines §§ 15063(c)(3)(A) and 15128.) Therefore,

analysis of noise from maintenance operations was not improperly omitted from the Draft EIR. The Initial Study accurately evaluated noise impacts associated with aircraft engine ground run-ups on the proposed project site. Specifically, a detailed evaluation of noise impacts from engine run-ups is provided on pages 71 through 73 of the Initial Study. This evaluation was based on a comprehensive analysis of noise impacts from aircraft engine ground run-up activity at LAX prepared on behalf of LAWA titled *Los Angeles International Airport (LAX) Ground Run-up Enclosure (GRE) Siting Study.*¹

The commenter states that the proposed project would "enable 200 high power engine run-ups per year, approximately 20 of which would likely occur somewhere other than at the Project site due to adverse wind conditions." As stated on page 72 of the Initial Study, it is expected that between two and four high-power engine run-ups would be conducted on the proposed project site each week, on average. These are not new engine run-ups that would be enabled by the proposed project; rather, as stated in the Initial Study, these are existing engine run-ups that currently occur at LAX, and that would be relocated from the west side of the airport to the east side of the airport as a result of the proposed project, which would place the engine run-up activity farther away from noise-sensitive residential uses. Moreover, the Initial Study does not state that 20 of these engine run-ups would likely occur somewhere other than at the project site. As stated on page 72 of the Initial Study, the proposed run-up area would only be able to accommodate engine run-ups approximately 90 percent of the time, due to wind conditions. During times when wind conditions would not permit use of the on-site run-up area, run-ups would not necessarily occur at other locations at LAX. Instead, when possible, UAL would simply postpone an engine run-up until it could be accommodated on the proposed project site. Due to the variability in wind conditions, and the variability in run-up activity, the number of run-ups that would be postponed and the number of run-ups that would be conducted at other locations at LAX cannot be quantified. Nevertheless, the number of run-ups that would be conducted at other locations at LAX would be less than 10 percent of the total number of estimated engine run-ups (i.e., less than 10 to 20 per year). In the event that an engine run-up could not be conducted at the on-site run-up area and could not be postponed, the run-up could only be conducted at a location at LAX with a blast fence that is situated for adverse wind conditions. There is only one such location at LAX, which is at UAL's current West Maintenance Facility. If UAL needed to conduct an engine run-up during adverse wind conditions, UAL would use the blast fence at the West Maintenance Facility, provided that LAWA or the future leaseholder would permit such use. UAL currently permits other airlines to use this blast fence when needed during adverse wind conditions. As the blast fence at the West Maintenance Facility is currently used for high-power engine run-ups, this would not represent a change from existing conditions, and no new noise impacts would occur from this occasional use.

The commenter states that the Draft EIR must include a single event noise analysis. As noted above, pages 71 through 73 of the Initial Study describe potential noise impacts associated with the proposed eastward shift in UAL's aircraft engine ground run-up activities. The noise impacts in the Initial Study are discussed in terms of CNEL given that there are recognized and widely-accepted thresholds of significance that are based on CNEL, such as those used by LAWA in environmental documents for this, and other, LAX projects. There are no such established thresholds of significance for single-event noise, including noise associated with aircraft engine ground run-ups. However, the single-event noise characteristics associated with project-related aircraft engine ground run-ups would not be materially different from those that have occurred in the project area over many years at the Delta Air Lines aircraft

maintenance facility, which is located directly northwest of, and adjacent to, the UAL East Maintenance Facility, and has an aircraft engine ground run-up area, including a blast fence, which has been in use for over 20 years. The potential for periodic aircraft engine ground run-up noise emanating from aircraft maintenance activities in this general area to occasionally be perceptible in surrounding areas would effectively be no different with the proposed project than it has been for more than two decades. The type of aircraft maintenance activities, including aircraft ground engine run-ups, that would occur at the proposed UAL East Aircraft Maintenance and GSE Project site would be comparable to aircraft maintenance activities that have historically occurred at the Delta Air Lines aircraft maintenance facility. As with the activities at the Delta facility, engine run-ups at the proposed project site would occur over short periods of time (i.e., 5-10 minutes), on varying days and at varying times, and would include aircraft engines of varying types that would be powered-up for testing. With respect to single-event noise, the noise from engine ground run-ups associated with the proposed project would be indistinguishable from similar ground run-ups performed historically by Delta Air Lines immediately adjacent to the proposed project site. These two major airlines operate and maintain generally similar fleets at LAX; the single-event noise level associated with an engine ground run-up for a Boeing 737 operated by Delta Air Lines would be no different from that of a Boeing 737 operated by UAL, or for a Boeing 777, which both airlines use in their respective fleets, or any other aircraft type. Moreover, the Delta Air Lines maintenance activities will be relocated to the west side of the airport by 2019, which is prior to completion of the proposed project. Therefore, there will be no cumulative impacts from engine ground run-ups located on the east side of the airport. In summary, a single-event noise analysis is not required to be conducted in order to evaluate noise impacts associated with the proposed project and, even if it were, the single-event noise characteristics associated with future aircraft engine ground run-ups that would occur at the proposed project site are not expected to be materially different from the historical single-event noise characteristics of the area.

¹ City of Los Angeles, Los Angeles World Airports, Los Angeles International Airport (LAX) Ground Run-up Enclosure (GRE) Siting Study, February 18, 2015.

UAL-AL01-6

- **Comment:** El Segundo also requests that LAWA implement real-time noise monitoring for all Project-related run-ups (including a portal on LAWA's website where the public can keep track of single event run-up noise), as is currently conducted at the West Aircraft Maintenance Area.
- **Response:** El Segundo's request that LAWA implement real-time monitoring for project-related run-ups is noted. As noted in the response to Item XII, *Noise*, in the Initial Study, engine run-up activity associated with the proposed project would not result in any significant noise impacts.

UAL-AL01-7

Comment: El Segundo Strongly Opposes Use of an "Optional" Steel Laydown North of Imperial Highway, and Use of Imperial Highway as a Truck Route.

In our comments on the NOP/IS, we commended LAWA for not including any construction hauls through El Segundo as part of the Project. The DEIR, however, adds an "optional" construction staging area just north of Imperial and a potential haul route on the eastern half of Imperial. Despite these additions, the DEIR does not include any traffic study section

along this stretch of Imperial. The City strongly urges that this "optional" staging area be removed in the Final EIR. And, as always, the City asks that vehicle trips avoid El Segundo entirely, when possible.

Response: The commenter's request to remove the optional steel laydown area on the north side of Imperial Highway is noted. With respect to the comment that the Draft EIR "does not include any traffic study section along this stretch of Imperial," it should be noted that, as stated on page 4.4-1 of the Draft EIR, deliveries to the steel laydown area, and between the laydown area and the project site, would occur outside of the morning and evening commuter peak hours. Because no traffic to or from the steel laydown area would occur during commuter peak hours, no additional detailed analysis of traffic impacts along Imperial Highway is required.¹ Additionally, LADOT does not require construction traffic analyses.²

The UAL East Aircraft Maintenance and GSE Project Draft EIR provided a detailed analysis of Construction Traffic in Section 4.4.1, *Construction Transportation/Traffic*, based on project-specific modeling of Baseline Traffic, Baseline Plus Peak Proposed Project Traffic, Future Cumulative Traffic Without Project, and Future Cumulative Traffic With Project. As noted on page 4.4-10 of the Draft EIR, 31 area intersections were assessed to determine those intersections that were projected to have a 0.4 percent or greater increase in traffic volume/capacity with the project, which were then subject to detailed analysis. As a result of this detailed analysis, project-related construction traffic was determined to result in a cumulatively considerable contribution to significant cumulative traffic impacts, and mitigation was proposed that would fully address this impact. Specifically, as noted on page 4.4-9 of the Draft EIR, and as revised in Chapter 3, *Corrections and Additions to the Draft EIR*, LAWA's existing CALM program "requires bulk material deliveries (e.g., aggregate, bulk cement, dirt), to be scheduled during off-peak hours unless prior written approval is provided by the CALM Team."

The same types of requirements have been successfully implemented on all of LAWA's projects including, but not limited to, the Bradley West Project, Central Utility Plant Project, Crossfield Taxiway Project, South Airfield Improvements Project, and Landside Access Modernization Program, as demonstrated in LAWA's Mitigation Monitoring and Reporting Program Annual Progress Reports, which are provided on an annual basis and made available on LAWA's website.³ These provisions stem from LAWA's previously approved LAX Master Plan Commitments ST-12 ["Designated Truck Delivery Hours...shall avoid the peak periods..."], ST-16 ["Designated Haul Routes], ST-18 [Construction Traffic Management Plan], and C-1 ["Establishment of a Ground Transportation/Construction Coordination Office]. These types of measures are ideal for handling construction roadway conditions that are likely to change from day to day over the duration of the construction period. Similar provisions were upheld by the Court of Appeal in Neighbors for Smart Rail v. Exposition Metro Line Construction Authority (2012) Case No. B232655. While this case was reviewed by the Supreme Court, this issue was not overturned. More specifically, the Court of Appeal upheld the construction traffic management mitigation noting "The EIR contemplated that major arteries will not be closed during nonweekend and nonevening hours without that approval, which is an acceptable performance standard...Petitioner has demonstrated no inadequacy in the Expo Authority's construction mitigation measures." (Slip Opinion at 39.)

The commenter's request that vehicle trips avoid El Segundo, when possible, is noted. Haul routes that would be used for the proposed project are illustrated on Figure 2-9 of the Draft

EIR. As shown in the figure, the proposed haul routes would avoid the City of El Segundo, with the exception of trips along Imperial Highway between the optional steel laydown area and the project site, should this laydown area be selected.

- ¹ The same cannot be said of numerous City of El Segundo CEQA analyses, which do not appear to address construction traffic (e.g., City of El Segundo, Raytheon El Segundo South Campus Specific Plan Project Public Available: prepared RBF Review Draft EIR, by Consulting, July 2014. https://elsegundo.org/depts/planningsafety/planning/el_segundo_south_specific_plan_draft_eir.asp. City of El Segundo, Agenda Report: Possible Action Regarding the Adoption of Ordinance No. 516 for a Zone Change Manufacturing, dated from the Light January 19, 2016. Available: https://www.elsegundo.org/civicax/filebank/blobdload.aspx?BlobID=14546. ["On December 15, 2015, the City Council adopted Resolution No. 4958 certifying the Environmental Impact Report (Environmental Assessment No. EA-905) for the El Segundo South Campus Specific Plan project."]; City of El Segundo, The Lakes Specific Plan and Topgolf Project Public Review Draft EIR, prepared by Michael Baker International, January 2017. Available: https://www.elsegundo.org/civicax/filebank/blobdload.aspx?BlobID=15601; and City of El Segundo, Smoky Hollow Specific Plan Draft EIR, March 2018, and City of El Segundo, Smoky Hollow Specific Plan Recirculated Draft EIR, June 22, 2018. Available: https://elsegundo.org/depts/planningsafety/planning/smoky hollow specific plan update.asp.
- ² As indicated on page 4.4-9 of the Draft EIR, during the scoping of the South Airfield Improvement Project (SAIP) EIR traffic study in 2004, LADOT indicated that no traffic study was required because there was "no requirement to assess the temporary traffic impacts of a project resulting from construction activities. So, the proposal to prepare a traffic study is voluntary." [Carranza, Tomas, City of Los Angeles Department of Transportation, Electronic Mail Message to Pat Tomcheck, Los Angeles World Airports, *Subject: Re: FW: LAX Traffic Methodology Memo*, July 29, 2004.] Additionally, LADOT reiterated in January 2017 that it does not require traffic impact studies for traffic construction-related impacts. [Ayala, Pedro, City of Los Angeles Department of Transportation, Electronic Mail Message to Pat Tomcheck, Los Angeles World Airports, *Subject: Re: Traffic Impact Studies for Construction-Related Impacts*, January 19, 2017.] LAWA determined at that time that the preparation of a traffic study is useful in order to provide a full assessment and documentation of the impacts generated by the construction of the proposed project.
- ³ Los Angeles World Airports, LAX Mitigation Monitoring and Reporting Programs (MMRP), *MMRP Progress Reports*. Available: https://www.lawa.org/en/lawa-our-lax/studies-and-reports/mitigation-monitoring-reporting-program.

UAL-AL01-8

- **Comment:** Thank you for the opportunity to comment on the Project. We request that this firm and the City of El Segundo Planning and Building Safety Department receive a copy of any proposed revisions to the EIR, including the Final EIR.
- **Response:** This comment is noted. LAWA will send a copy of the Final EIR, including any proposed revisions to the Draft EIR, to the City of El Segundo Planning and Building Safety Department, as requested.
- UAL-AL01-9 [City of El Segundo's January 8, 2018 Comments on the UAL East Aircraft Maintenance and GSE Project Notice of Preparation/Initial Study – These comments were prepared by the City of El Segundo before the release of the UAL East Aircraft Maintenance and GSE Project Draft EIR]
- **Comment:** On behalf of the City of El Segundo, thank you for the opportunity to review the Notice of Preparation and Initial Study for the United Airlines East Aircraft Maintenance and Ground Support Equipment Project ("Project"). El Segundo expects to be actively involved in the planning process and looks forward to follow-up discussions and close coordination as the Project goes forward.

As LAWA is aware, El Segundo has a number of longstanding concerns related to LAX, particularly around noise and traffic impacts originating on the southern airfield and/or directed toward El Segundo. El Segundo appreciates that, for now, the Project appears to

be designed to reduce the physical footprint of United's aircraft maintenance and ground service equipment ("GSE") operations (Initial Study at Table 1), and to move existing high-power aircraft engine run-ups farther from the closest receptors in El Segundo (*id*. At 72). Nevertheless, El Segundo believes that the potential transportation, air quality, and climate change impacts identified in the Initial Study could be further minimized, or avoided, if LAWA describes the Project more thoroughly in the Draft Environmental Impact Report ("DEIR"). LAWA should also ensure the Project is consistent with its prior development proposals and decisions, including those encompassed by the LAX Master Plan, Specific Plan, and the ongoing ground run-up enclosure ("GRE") siting and environmental review process.

Project Description. El Segundo is concerned that the DEIR could fail to sufficiently analyze the Project's potential impacts due to an incomplete or inaccurate project description. The Project would expand the existing eastern United aircraft maintenance area lease, due to relocation of activities currently occurring at United's western maintenance area, for which the lease is expiring in 2020. The consolidation would include "redevelopment" of approximately 38 acres/411,000 square feet for a new maintenance facility and additional aircraft parking positions, among other Project elements. The Initial Study states that "[w]hile the basic elements of redeveloping and improving the East Maintenance Facility have been determined, the exact sizes and reconfiguration of those elements are still being evaluated by the project applicant." *Id.* at 8. While it is perhaps understandable that the DEIR would contain a more detailed project description than the Initial Study, LAWA must disclose the full scope of the Project to the public at the earliest opportunity. No uncertainty about the Project's description should persist in the DEIR.

The Initial Study also suggests that LAWA has no plans for the west maintenance lease site after 2020. *Id.* at 1. However, continuation of existing or similar uses is at least reasonably foreseeable because maintenance and aircraft parking facilities already exist. El Segundo has previously expressed concern about expanded aircraft maintenance activities in the vicinity of the western maintenance area. *See* attached West Aircraft Maintenance Area ("WAMA") DEIR comments, Dec. 2, 2013, at 8. The DEIR should state and evaluate the potential future use(s) of the western maintenance area after 2020, and any potential future use of the west maintenance facility site should be consistent with the LAX Master Plan and Specific Plan.¹ Furthermore, the western maintenance area is immediately adjacent to one of four possible locations identified LAWA for a GRE, one of two GREs required by the 2004 LAX Master Plan. If any future use of the western maintenance site could interfere with the study or environmental review of potential GRE sites, LAWA should disclose this potential. El Segundo has previously asked to be included in the GRE siting, review, and approval process, and reiterates this request here.

The Initial Study also states the Project would not increase the volume of existing maintenance operations. Initial Study at 4. This implies that the Project's operational parameters are defined as the "net" maintenance operations after drawdown of the western maintenance area after 2020. *See id.* at Table 1 (stating Project would include 23 aircraft parking spots, compared to the current total of 34 spots at both lease sites). However, the Project as described does not clearly commit LAWA to ceasing maintenance, parking, or other existing operations at the western facility once that lease expires; indeed, it is reasonably foreseeable that the same or similar uses will continue after 2020. Therefore, unless maintenance operations are to be prohibited at the western facility once United vacates, the DEIR must consider the Project's elements, including the new maintenance facility and 10 additional aircraft parking spots,² as *additive* to the existing

United lease components. These existing components are the physical baseline against which LAWA must evaluate the Project, and LAWA cannot assume without substantial evidence that these components will disappear for purposes of the DEIR's analysis.

Similarly, the Initial Study states that the Project would not increase passenger or gate capacity. *Id.* at 4-5. To justify this conclusion, LAWA must make a clear commitment that the updated lease with United will prohibit passenger loading/unloading at the Project site. Regardless, the DEIR should state what the Project's parking spots will be used for (e.g., active maintenance, remain overnight/remain all day (RON/RAD) aircraft parking, cargo loading/ unloading), provide an enforceable commitment that parking spaces will be used only for these purposes, and evaluate the associated airport capacity and environmental impacts.

The Initial Study also states that the Project would alter on- and off-airport vehicle movement, and "aircraft movement" on the ground, due to shifting of employees, equipment, and aircraft from United's western maintenance lease to the Project site. *Id.* at 3, 4, 21. The Initial Study does not describe in any detail the anticipated changes in aircraft movement caused by the Project. The DEIR must include this information as well as an analysis of any potential impacts from the changes in aircraft ground operations caused by the Project.

Noise. The Initial Study states that the Project will include a new blast fence for high-power engine ground run-ups, which presently occur at the western maintenance facility but not at the eastern facility. *Id.* at 72 (stating that 2-4 high-power run-ups would occur each week, and would comply with the 11pm-6am ground run-up curfew). Although the Initial Study states that conducting ground run-ups at the Project site would move these operations farther away from sensitive receptors in El Segundo (*id.*), LAWA still must accurately evaluate any associated noise impacts, including as part of a single event noise analysis. LAWA should also consider (as a Project alternative or mitigation, for example) whether construction of a GRE is appropriate at the Project site because the new maintenance facility could provide components necessary for, or complementary to, a GRE. Although this location has not been on LAWA's list of sites under consideration for a GRE to date, it is farther from some sensitive residential uses south of the airport than the western GRE locations LAWA is presently considering, and thus potentially preferable to El Segundo.

Parking. During construction, United employees stationed at the east maintenance facility, and some employees who will be bused to the west facility, will be required to use parking lot "H" instead of parking lot "F." *Id.* at 14. During Project construction, parking lot F will also be used by construction workers. *Id.* at 78. The Initial Study does not state the peak number of United employees and construction workers that would need to use parking lot F simultaneously, and whether the parking lot could accommodate this number. The DEIR must include this information. As LAWA is aware, El Segundo has longstanding concerns about LAX's and its contractors' employees improperly parking within El Segundo's limits, and is worried the Project could worsen this problem, both during and after construction.

Traffic. The Initial Study states that United employees that presently use Imperial Highway to access the west maintenance facility will likely use Century Boulevard to access the Project site once the leases are consolidated. Neither Imperial Highway nor other El Segundo roadways are included in the list of Project haul routes. El Segundo appreciates this aspect of the Project and expects it will remain in the DEIR; as always, the City asks that vehicle trips avoid El Segundo when possible. If the potential arises for construction vehicles or employee traffic to use Imperial Highway, Pershing Drive or internal city streets, the DEIR

must disclose this information and LAWA should require these vehicles to use El Segundo's designated truck routes.

Thank you for the opportunity to comment on the Project. We request that this firm and the City of El Segundo Planning and Building Safety Department receive a copy of the DEIR.

- ^{1.} The WAMA is located on a site that the Master Plan identifies for employee parking, yet LAWA has not amended the Master Plan to reflect the change in use, against El Segundo's urging. WAMA DEIR comments at 8. Continued use of United's western lease for maintenance operations would concentrate more aircraft maintenance and parking in this part of the airport than the Master Plan allows.
- ² Although Table 1 of the Initial Study suggests the Project would only add 4 parking spots to the eastern maintenance area, Figure 6 indicates that the new maintenance facility could provide an additional 6 narrowbody parking spots, for a total of 10 new parking spots.
- The commenter states that they "incorporate by reference herein the City's January 8, 2018 **Response:** comments on the Notice of Preparation and Initial Study ("NOP/IS") for the Project." The commenter acknowledges in their letter on the Draft EIR that "[t]he City also appreciates that the DEIR addresses some of the City's concerns about adequate parking for workers during construction, and changes to on-airfield aircraft movement due to the Project." However, the commenter does not explain which comments they believe to still be at issue from their NOP/IS comments, other than those issues specifically raised in their August 13, 2018 letter. Please see Responses to Comments UAL-AL01-1 through UAL-AL01-8 above, which address many of the issues raised in the commenter's NOP/IS correspondence. As indicated in the City of El Segundo's introductory comment on the UAL East Aircraft Maintenance and GSE Project Draft EIR (Comment UAL-AL01-1 above), LAWA thoughtfully considered the City of El Segundo's comments on the NOP/IS and, as reflected in Chapter 2, Project Description, of the Draft EIR, refined the proposed project and provided additional project details to address such comments, as further discussed below. Chapter 2 provides a detailed and thorough description of the full scope of the proposed project, and serves as the appropriate basis for the analysis of transportation, air quality, climate change, and other impacts.

The commenter requests that LAWA ensure that the project is consistent with its prior development proposals and decisions, including those encompassed by the LAX Master Plan, Specific Plan, and the ground run-up enclosure (GRE) siting and environmental review process. Consistency with the LAX Specific Plan is addressed in Section 3.2, *Land Use Setting*, in Chapter 3, *Overview of Project Setting*, of the Draft EIR. The relationship of the proposed project to the LAX Master Plan is addressed in Response to Comment UAL-AL01-2. The relationship of the proposed project to the GRE siting and environmental review process is addressed below.

Project Description. The commenter asserts that "No uncertainty about the Project's description should persist in the DEIR." The commenter provides no legal authority to support this assertion, and there is none. CEQA Guidelines Section 15124 states that "The description of the project shall contain the following information *but should not supply extensive detail beyond that needed for evaluation and review of the environmental impact.*" (Emphasis added; see also *Dry Creek Citizens Coalition v. County of Tulare* (1999) 70 Cal.App.4th 20 [final design does not need to be completed at the time of the project approval.].)

Regarding comments on the NOP/IS that pertain to the project description, specifically comments related to potential future use of UAL's West Maintenance Facility, please see Responses to Comments UAL-AL01-2 and UAL-AL01-3 above.

The commenter states that "El Segundo has previously expressed concern about expanded aircraft maintenance activities in the vicinity of the western maintenance area. See attached West Aircraft Maintenance Area ("WAMA") DEIR comments, Dec. 2, 2013, at 8." LAWA provided responses to all comments on the West Aircraft Maintenance Area Draft EIR submitted by the City of El Segundo on December 2, 2013, identified as comment letter WAMA-AL00001, in the WAMA Final EIR. The WAMA Final EIR is available on LAWA's website at the following link: https://lawamediastorage.blob.core.windows.net/lawamedia-files/media-files/lawa-web/lawa-our-lax/west-aircraft-maintenance-area-

project/lax-wama---volume-5_feir.pdf. All of LAWA's written responses on the WAMA Draft EIR are thorough, detailed, and provide good faith, reasoned analyses and are hereby incorporated by reference as part of this Final EIR for the LAX UAL East Aircraft Maintenance and GSE Project.

Regarding comments on the NOP/IS pertaining to a potential future GRE, UAL's East Maintenance Facility was not considered as a possible location for a GRE in the LAX GRE Siting Study. The continued use of the proposed project site for aircraft maintenance would not interfere with the study or environmental review of a GRE located in proximity to the facility.

With respect to the comment in Footnote 2 pertaining to the amount of aircraft maintenance and parking in the LAX Master Plan, please see Response to Comment UAL-AL01-2.

Regarding the comment pertaining to the use of aircraft parking positions and passenger gate activity on the proposed project site, please see Response to Comment UAL-AL01-4.

Regarding the comment requesting that details about anticipated changes to on- and off-airport vehicle movements and to aircraft movements from implementation of the proposed project be described in the Draft EIR, in Comment UAL-AL01-1 of the commenter's letter on the Draft EIR, the commenter acknowledges that the Draft EIR "addresses some of the City's concerns about...changes to on-airfield aircraft movement due to the project." The commenter's letter on the Draft EIR did not raise any new concerns regarding on-airfield aircraft movement and did not specify which (if any) concerns remain unaddressed. Changes to vehicle movements and to on-airfield aircraft movements are adequately described in Section 2.1, Project Overview, in Chapter 2, Project Description, and Section 4.1.1.2.2, Emissions Source Types - Operations, in Section 4.1.1, Air Quality, of the Draft EIR, as well as in other sections of the Draft EIR. The impacts associated with changes in on- and off-airport vehicle movements from implementation of the proposed project are adequately addressed in Section 4.4.2, Operational Transportation/Traffic, as well as in Section 4.1, Air Quality and Human Health Risk, Section 4.3, Greenhouse Gas Emissions, and Section 6.5.2, Energy Demand, of the Draft EIR. The impacts associated with changes in aircraft movements on the airfield from implementation of the proposed project are addressed throughout the Draft EIR, including, but not limited to, Section 4.1.1.5.2, Operational Impacts (pertaining to air quality), and Section 4.1.2.5, Impacts Analysis (pertaining to human health risk), in Section 4.1, Air Quality and Human Health Risk; Section 4.3.5.1.2, Operational Emissions, in Section 4.3, Greenhouse Gas Emissions, of the Draft EIR; and Section 6.5.2, Energy Demand, of the Draft EIR.

Noise. Regarding comments on the NOP/IS related to noise associated with engine ground run-ups, please see Response to Comment UAL-AL01-5 above. Regarding the suggestion that LAWA consider, as a project alternative or as mitigation, whether construction of a GRE is appropriate at the project site, as noted in response to Item XII, *Noise*, in the Initial Study, engine run-up activity associated with the proposed project would not result in any significant noise impacts. Therefore, no mitigation, including a GRE, is warranted, nor is there any requirement to evaluate alternatives that would include a GRE on the proposed project site.

Parking. In response to the commenter's comments on the NOP/IS related to parking during construction, a detailed description of construction and operational employee parking was provided in Section 2.4.3, *Parking*, of Chapter 2, *Project Description*, of the Draft EIR. In Comment UAL-AL01-1 of the commenter's letter on the Draft EIR, the commenter acknowledges that the Draft EIR "addresses some of the City's concerns about adequate parking for workers during construction." The commenter's letter on the Draft EIR did not raise any new concerns regarding parking and did not specify which (if any) concerns remain unaddressed.

Traffic. The comment that cites statements in the Initial Study that UAL employees that presently use Imperial Highway to access the West Maintenance Facility will likely use Century Boulevard to access the project site once the leases are consolidated is noted. As stated in Section 2.1, *Project Overview*, in Chapter 2, *Project Description*, of the Draft EIR, employees would access the proposed project site via Century Boulevard or a generally parallel network of side roads located south of Century Boulevard. Regarding comments on the NOP/IS related to the possible use of Imperial Highway or other El Segundo roadways for construction haul routes, as shown on Figure 2-9 of the Draft EIR, Imperial Boulevard would be used as a construction haul route if Optional Steel Laydown Area #1 is selected during construction. For additional detail regarding the potential use of this steel laydown area, and the accompanying use of Imperial Highway during construction, please see Response to Comment UAL-AL01-7 above.

Closing Comment. In response to the request by the commenter, as indicated in Section 7.2, *Parties to Whom Sent*, of the Draft EIR, four copies of the Draft EIR were provided to the City of El Segundo, including a copy to Gregg McClain, Planning Manager in the City of El Segundo's Planning and Building Safety Department. In addition, as indicated in Section 7.2, four copies of the Draft EIR were provided to the City of El Segundo's outside legal counsel, Shute, Mihaly & Weinberger LLP.

UAL-PC01 Kaloshian, Nicole WSCC

7/31/2018

UAL-PC01-1

- **Comment:** Thanks for the open house to learn more about LAWA!
- **Response:** This comment is noted.

UAL-PC02 Peery, John Mercury Air Cargo

8/3/2018

UAL-PC02-1

- **Comment:** Mercury Air Group previously commented during the NOP for the Draft EIR. Our comment requested the addition of two important modifications to increase pedestrian and traffic safety. We are happy to report that we have worked with United Airlines to have those concerns addressed and I am pleased to inform you that we now fully support the project. The attached drawing incorporated by the UA project team addresses our prior comments and coordination efforts.
- **Response:** It is noted that the commenter fully supports the project as modified. This comment is hereby part of the Final EIR and will be forwarded to the decision-makers for their consideration prior to taking any action on the UAL East Aircraft Maintenance and GSE Project.

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3. CORRECTIONS AND ADDITIONS TO THE DRAFT EIR

3.1 Introduction

The following revisions are hereby made to the text of the Draft EIR. Changes in the text are signified by strikeouts where text is removed and shown with italics and underline where text is added. These changes do not add significant new information to the EIR that would require Draft EIR recirculation under State CEQA Guidelines Section 15088.5. For example, they do not disclose or suggest new or substantially more severe significant environmental impacts of the proposed project, or a new feasible mitigation measure or alternative considerably different than those analyzed in the Draft EIR that would clearly lessen the proposed project's significant effects.

3.2 Corrections and Additions to the Draft EIR Text

Chapter 1, Introduction and Executive Summary

1. The second paragraph on page 1-2 under Section 1.2, *Summary of Proposed Project*, is hereby revised as follows:

UAL proposes to redevelop its existing eastern facility to consolidate all of UAL's aircraft and GSE maintenance activities. Following implementation of the proposed project, the West Maintenance Facility would remain vacant until such time as LAWA leases the facility to a tenant or proposes redevelopment of the site, which may be subject to its own environmental review and documentation, as appropriate <u>under applicable law</u>. Reasonably foreseeable uses of the West Maintenance Facility are discussed in Chapter 3, *Overview of Project Setting*, and the cumulative impacts of the proposed project, reasonably foreseeable future use of the West Maintenance Facility, and other development projects at and adjacent to LAX are addressed in Chapter 4, *Environmental Impact Analysis*.

Chapter 2, Project Description

1. The second paragraph on page 2-1 under Section 2.1, *Project Overview*, is hereby revised as follows:

UAL proposes to redevelop its existing eastern facility to consolidate all of UAL's aircraft and GSE maintenance activities. Following implementation of the proposed project, the West Maintenance Facility would remain vacant until such time as LAWA leases the facility to a tenant or proposes redevelopment of the site, which may be subject to its own environmental review and documentation, as appropriate <u>under applicable law</u>. Reasonably foreseeable uses of the West Maintenance Facility are discussed in Chapter 3, *Overview of Project Setting*, and the cumulative impacts of the proposed project, reasonably foreseeable future use of the West Maintenance Facility, and other development projects at and adjacent to LAX are addressed in Chapter 4, *Environmental Impact Analysis*.

- 2. The second to the last bullet on page 2-11 under Section 2.4.2, *Project Components*, is hereby revised as follows:
 - Reconfigure the apron and include aircraft parking positions in the hangar for a total of <u>up to</u> 22 aircraft parking positions on the leasehold, including 6 in the hangar, <u>up to</u> 6 on the south side of the project site, and <u>up to</u> 10 within the western portion of the leasehold.

- 3. The last bullet and associated footnote 11 on page 2-11 under Section 2.4.2, *Project Components*, are hereby revised as follows:
 - Provide an aircraft wash pad in a contained area for conducting dry washes of aircraft.¹¹
 ¹¹ U.S. Department of Transportation, Federal Aviation Administration, Aviation Maintenance Technician Handbook General (FAA H 8083-30A), Chapter 8, 2018. Available: https://www.faa.gov/regulations_policies/handbooks_manuals/aircraft/media/amt_general_handbook.pdf. According to this Handbook, aircraft dry washing is a process that removes airport film, dust, and small accumulations of dirt and soil without the use of water. The dry washing process involves applying a cleaning compound that meets international aviation standards to the exterior of the aircraft with sprays, mops, or cloths. Once the compound has dried, the material is removed by dry mopping or wiping with clean, dry cloths.
- 4. The fourth bullet on page 2-12 under Section 2.4.2, *Project Components*, is hereby revised as follows:
 - Install a diesel-powered backup generator to provide emergency power, and transformer equipment, and fire pumps on a small portion of the adjacent UAL cargo yard.

5.	Table 2-1 on page 2-12 under Section 2.4.2, Project Components, is hereby revised as fol	lows:

Table 2-1 Baseline and Proposed Facilities						
Facility	Baseline Facilities		Proposed Facilities			
	Approximate Building Area (square feet)	Aircraft Parking Positions	Approximate Building Area (square feet)	Aircraft Parking Positions		
West Maintenance Facility	593,050	15	NA	NA		
East Maintenance Facility	135,750	19	411,000	<u>Up to</u> 22		
Total	728,800	34	411,000	<u>Up to</u> 22		
Source: United Airlines, FSB, 2017, 2018.						

Chapter 3, Overview of Project Seting

1. The second sentence of the second paragraph on page 3-8 is hereby revised as follows:

Any proposed reuse of the West Maintenance Facility may be subject to its own environmental review and documentation, as appropriate <u>under applicable law</u>.

Section 4.4, Transportation/Traffic

1. The fourth sentence of the second full paragraph on page 4.4-9 is hereby revised as follows:

Specifically, the Handbook requires bulk material deliveries (e.g., aggregate, bulk cement, direct <u>dirt</u>) to be scheduled during off-peak hours unless prior written approval is provided by the CALM Team.

2. Footnote 283 on page 4.4-34 is hereby revised as follows:

Any proposed reuse of the West Maintenance Facility may be subject to its own environmental review and documentation, as appropriate <u>under applicable law</u>.

3. Footnote 294 on page 4.4-43 is hereby revised as follows:

Any proposed reuse of the West Maintenance Facility may be subject to its own environmental review and documentation, as appropriate <u>under applicable law</u>.

Chapter 5, Alternatives

1. The last sentence of the paragraph under Section 5.2, *Significant Impacts of the Project*, on page 5-1 is hereby revised as follows:

The demolition of the two intact, surviving Intermediate Terminal Facility buildings would be a significant and unavoidable impact after implementation of mitigation measures (identified in Section 4.2.7) and no other feasible mitigation measures are available to further reduce the impact to 6000-6016 and 6020-6024 Avion Drive beyond compliance with the LAX Preservation Plan were identified.

2. The last sentence of the first paragraph under Section 5.4.1, *New West Maintenance Facility*, on page 5-2 is hereby revised as follows:

The project site would be large enough to add additional RON/RAD spaces, but the total number of spaces would be lower than the <u>up to</u> 22 spaces associated with the proposed project.

3. The sixth sentence of the paragraph under Section 5.5.3, *Alternative 3 – Reduced Development*, on page 5-9 is hereby revised as follows:

Under this alternative, the total number of RON/RAD spaces would be <u>up to</u> 13, including <u>up to</u> 10 on the western portion of the leasehold and 3 in the new hangar.

4. The eleventh sentence of the paragraph under Section 5.5.3, *Alternative 3 – Reduced Development*, on page 5-9 is hereby revised as follows:

In addition, the project site would accommodate <u>up to</u> 10 outdoor parking positions.

Chapter 6, Other Environmental Considerations

1. Footnote 301 on page 6-3 is hereby revised as follows:

Any proposed reuse of the West Maintenance Facility may be subject to its own environmental review and documentation, as appropriate <u>under applicable law</u>.

Chapter 7, List of Preparers, Parties to Whom Sent, References, NOP Comments, and List of Acronyms

1. The second reference on page 7-21 is hereby revised as follows:

U.S. Department of Transportation, *Federal Aviation Administration, Aviation Maintenance Technician Handbook – General (FAA-H-8083-30),* Chapter 6, 2008. Available: https://www.faa.gov/regulations_policies/handbooks_manuals/aircraft/amt_handbook/. This page intentionally left blank
Attachment 1 – Original Comment Letters on the UAL East Aircraft Maintenance and GSE Project Draft EIR This page intentionally left blank



Changes since 8/13/18 3:59 PM

1 row added, 1 row changed

1 attachment added

1 row added or updated (shown in yellow)

Row 2

Row ID	2
Full Name	Todd Davis
Company Name	California Department of Transportation
Email Address	todd.davis@dot.ca.gov
Comments	Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. Please find Caltrans' comment letter attached.

UAL-AS01

Created	08/13/18 3:59 PM
Project	United Airlines – Draft EIR

Changes made by web-form@smartsheet.com

1 attachment added

?

LAX United Airlines East Aircraft Maintenance & Ground Support Equip Project_Comment Letter.pdf (535k) added by web-form@smartsheet.com on Row 2: Todd Davis

You are receiving this email because you are subscribed to a notification "Notification" (ID# 2565793968875396) on sheet <u>Our LAX Comment Form (Prod)</u>

Your notifications include changes made by you. Exclude your changes from all notifications

Don't want to receive this notification? Unsubscribe

Please do not reply to this mail. For support or questions, please contact us at www.smartsheet.com/gethelp

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DEPARTMENT OF TRANSPORTATION DISTRICT 7- OFFICE OF REGIONAL PLANNING 100 S. MAIN STREET, SUITE 100 LOS ANGELES, CA 90012 PHONE (213) 897-6536 FAX (213) 897-1337 TTY 711 www.dot.ca.gov



UAL-AS01-1

Making Conservation a California Way of Life.

August 13, 2018

Ms. Angelica Espiritu Los Angeles World Airports One World Way, Room 218 Los Angeles, CA 90045

> RE: LAX United Airlines East Aircraft Maintenance & Ground Support Equip Project SCH# 2017121019 GTS# 07-LA-2017-01671TD-DEIR

Dear Ms. Espiritu:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would redevelop a 35-acre site in eastern portion of the airport with a new 411,000 sq. ft. facility. The project would not affect the volume or basic nature of United Airlines' existing maintenance operations at LAX.

The nearest State facilities to the proposed project are Interstate 105 and 405. Based on review of the Draft Environmental Impact Report, Caltrans has the following comments:

- The document list past, present, and probable future projects producing related or cumulative impacts. Decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future.
- It is noted that LAWA has established a "Ground Transportation/Construction Office" UAL-AS01-2 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. In addition, the CALM team should be prepared to mitigate cumulative construction traffic if UAL-AS01-3 the previously mentioned projects are being developed simultaneously.
- In addition, oversized construction truck deliveries expected to utilize State Highways will need a transportation permit and possible a California Highway Patrol (CHP) escort.
- Due to recurrent traffic congestion of I-405 and I-105 during peak commuting periods, UAL-AS01-5

Ms. Espiritu August 13, 2018 Page 2

UAL-AS01

UAL-AS01-5 Continued

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 UAL-AS01-6 construction.

If you have any questions regarding these comments, please contact project coordinator Mr. Todd Davis, at (213) 897-0067 and refer to GTS# 07-LA-2017-01671TD.

Sincerely,

MIYA EDMONSON IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

UAL-AS02



GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH



DIRECTOR

· UAL-AS02-1

EDMUND G. BROWN JR. Governor

August 14, 2018

Angelica Espiritu Los Angeles World Airports One World Way, Room 218 Los Angeles, CA 90045

Subject: Los Angeles International Airport United Airlines East Aircraft Maintenance & Ground Support Equipment Project SCH#: 2017121019

Dear Angelica Espiritu:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on August 13, 2018, 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

Director, State Clearinghouse

Document Details Report State Clearinghouse Data Base

SCH# Project Title Lead Agency	Los Angeles International Airport United Airlines East Aircraft Maintenance & Ground Support			
Туре	EIR Draft EIR			
Description	The proposed project would consolidate and modernize existing United Airlines (UAL) aircraft maintenance and Ground Support equipment (GSE) facilities at LAX, which would allow for more efficient and effective maintenance of existing aircraft and GSE. The project would redevelop a 37-acre site in the eastern portion of the airport with a new 411,000 sq. ft. facility. All the buildings on the project site would be demolishes, with the exception of a Quonset Hut located near the northern boundary of the project site. The project would not affect the volume and basic nature of UAL's existing maintenance operations at LAX. The consolidation would alter on and off-airport vehicular movements, as well as aircraft movements on the airfield; it would not increase flights, aircraft operations, or passenger/gate capacity at LAX.			
Lead Agend	cy Contact			
Name	Angelica Espiritu			
Agency	Los Angeles World Airports			
Phone	(800) 919-3766 <i>Fax</i>			
email Address	One World Way, Room 218			
Address City	Los Angeles State CA Zip 90045			
Project Loc				
County	Los Angeles			
City	Los Angeles, City of			
Region				
Lat / Long Cross Streets	33° 56' 32.5" N / 118° 23' 21.5" W Nearest major intersection is Century Boulevard and Sepulveda Blvd			
Parcel No.	4129-028-900			
Township	3S Range 14W Section 6 Base			
Proximity to Highways	1(Lincoln/Sepulveda)			
Airports	LAX			
Railways	LA Metro Greeb Line			
Waterways	Pacific Ocean			
Schools	Bright Star Academy			
Land Use	LAX Specific Plan: LAX Zone - Airport Airside Subarea			
Project Issues	Archaeologic-Historic; Traffic/Circulation; Cumulative Effects; Other Issues			
Reviewing	Resources Agency; California Coastal Commission; Department of Fish and Wildlife, Region 5;			
Agencies	Department of Conservation; Department of Water Resources; Department of Parks and Recreation;			
Agencies	Caltrans, Division of Aeronautics; Caltrans, District 7; Air Resources Board; Air Resources Board,			
	Transportation Projects; Resources, Recycling and Recovery; Regional Water Quality Control Board,			
	Region 4; Native American Heritage Commission; Public Utilities Commission; State Lands			
÷	Commission			
Data Descinat	06/28/2018 Start of Review 06/28/2018 End of Review 08/13/2018			
Date Received	06/28/2018 Start of Review 06/28/2018 End of Review 08/13/2018			

UAL-AS03

UAL-AS03-1



STATE OF CALIFORNIA GOVERNOR'S OFFICE *of* PLANNING AND RESEARCH



EDMUND G. BROWN JR. Governor

August 16, 2018

Angelica Espiritu Los Angeles World Airports One World Way, Room 218 Los Angeles, CA 90045

Subject: Los Angeles International Airport United Airlines East Aircraft Maintenance & Ground Support Equipment Project SCH#: 2017121019

Dear Angelica Espiritu:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on August 13, 2018. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2017121019) when contacting this office.

Sincerel

Scott Morgan Director, State Clearinghouse

Enclosures cc: Resources Agency

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

UAL-AS03

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 7- OFFICE OF REGIONAL PLANNING 100 S. MAIN STREET, SUITE 100 LOS ANGELES, CA 90012 PHONE (213) 897-6536 FAX (213) 897-1337 TTY 711 www.dot.ca.gov 1-te 8-13-18 F.



Making Conservation a California Way of Life.

Governor's Office of Planning & Research

AUG 16 2018 STATE CLEARINGHOUSE

Ms. Angelica Espiritu Los Angeles World Airports One World Way, Room 218 Los Angeles, CA 90045

August 13, 2018

RE: LAX United Airlines East Aircraft Maintenance & Ground Support Equip Project SCH# 2017121019 GTS# 07-LA-2017-01671TD-DEIR

Dear Ms. Espiritu:

Thank you for including the California Department of Transportation (Caltrans) in the environmental review process for the above referenced project. The proposed project would redevelop a 35-acre site in eastern portion of the airport with a new 411,000 sq. ft. facility. The project would not affect the volume or basic nature of United Airlines' existing maintenance operations at LAX.

The nearest State facilities to the proposed project are Interstate 105 and 405. Based on review of the Draft Environmental Impact Report, Caltrans has the following comments:

- The document list past, present, and probable future projects producing related or cumulative impacts. Decision makers should be aware of this issue and be prepared to mitigate cumulative traffic impacts in the future.
- 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. In addition, the CALM team should be prepared to mitigate cumulative construction traffic if the previously mentioned projects are being developed simultaneously.
- In addition, oversized construction truck deliveries expected to utilize State Highways will need a transportation permit and possible a California Highway Patrol (CHP) escort.
- Due to recurrent traffic congestion of I-405 and I-105 during peak commuting periods,

Ms. Espiritu August 13, 2018 Page 2

> 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 regarding these comments, please contact project coordinator Mr. Todd Davis, at (213) 897-0067 and refer to GTS# 07-LA-2017-01671TD.

Sincerely,

MIYA ÉDMONSON IGR/CEQA Branch Chief

cc: Scott Morgan, State Clearinghouse

UAL-AR01

From:	Robert Dalbeck <rdalbeck@aqmd.gov></rdalbeck@aqmd.gov>
Sent:	Friday, August 10, 2018 9:06 AM
То:	ESPIRITU, ANGELICA G
Cc:	Daniel Garcia
Subject:	Request for Comment Period Extension on DEIR for the LAX United Airlines Aircraft Maintenance and
-	Ground Support Equipment Project

Dear Angelica,

The SCAQMD has received the DEIR for the LAX United Airlines Aircraft Maintenance and Ground Support Equipment Project and is currently reviewing it. The public comment period ends on Monday, August 13th. The SCAQMD staff appreciates the opportunity to comment on the above-mentioned document but we will be unable to send the comment letter within the public comment period. Therefore, we are requesting a two-day extension to submit our comments on August 15th.

If you have any questions regarding this request, please call me at the number listed below. Thank you and have a great weekend!

Best Regards,

Robert Dalbeck Assistant Air Quality Specialist, CEQA IGR South Coast Air Quality Management District 21865 Copley Drive Diamond Bar, CA 91765 P. (909) 396-2139 E. RDalbeck@aqmd.gov *Please note that the SCAQMD is closed on Mondays. From: Robert Dalbeck <<u>RDalbeck@aqmd.gov</u>
Sent: Tuesday, August 28, 2018 7:33 AM
To: ESPIRITU, ANGELICA G
Cc: Daniel Garcia; QUINTANILLA, EVELYN Y.; HARRIS, JAMES A
Subject: RE: Request for Comment Period Extension on DEIR for the LAX United Airlines Aircraft Maintenance and Ground Support Equipment Project

Hi Angelica,

Good Morning! I received your voicemail. We really appreciate your willingness to extend the comment period. After further review, the SCAQMD has no comments on the LAX United Airlines Aircraft Maintenance and Ground Support Equipment Project DEIR. Thank you very much.

Best Regards,

Robert Dalbeck | Assistant Air Quality Specialist, CEQA IGR South Coast Air Quality Management District 21865 Copley Drive | Diamond Bar, CA 91765 Phone: (909) 396-2139 | Email: <u>RDalbeck@aqmd.gov</u> *Please note that the SCAQMD is closed on Mondays.

SHUTE, MIHALY WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102 T: (415) 552-7272 F: (415) 552-5816 www.smwlaw.com JOSEPH D. PETTA Attorney Petta@smwlaw.com

August 13, 2018

Via E-Mail and FedEx

Angelica Espiritu Los Angeles World Airports One World Way, P.O. Box 92216 Los Angeles, California 90009-2216

Re: Draft Environmental Impact Report for LAX United Airlines East Aircraft Maintenance and Ground Support Equipment Project

Dear Ms. Espiritu:

On behalf of the City of El Segundo (the "City"), thank you for the opportunity to review the draft environmental impact report ("DEIR") for the United Airlines East Aircraft Maintenance and Ground Support Equipment Project ("Project"). The City appreciates that, for the most part, the Project would reduce the footprint of United's aircraft maintenance and ground service equipment operations, and move existing high-power aircraft engine run-ups farther from the City's closest receptors. The City also appreciates that the DEIR addresses some of the City's concerns about adequate parking for workers during construction, and changes to on-airfield aircraft movement due to the Project. Nonetheless, due to longstanding issues around noise and traffic impacts originating on the southern airfield and/or directed toward El Segundo, the City strongly opposes the adoption of Alternative 2 to the Project, which would expand and intensify maintenance operations at the western lease area instead.¹

- UAL-AL01-1 --

¹ In addition to these comments, we incorporate by reference herein the City's January 8, 2018 comments on the Notice of Preparation and Initial Study ("NOP/IS") for the Project.

Angelica Espiritu August 13, 2018 Page 2

I. Future Maintenance Use of United's West Maintenance Lease Area Was Improperly Excluded from This EIR.

The DEIR discloses that continued use of United's west maintenance area by another airline is "reasonably foreseeable."² CEQA therefore requires that this use be analyzed in the DEIR as part of the operation of the Project. Although the DEIR claims to address continued used of the west facility for maintenance in the DEIR's cumulative impacts analysis, this analysis appears nowhere in the DEIR. Instead, the DEIR summarily concludes that the Project would have less-than-significant cumulative operational impacts based just on the operations at the eastern lease. This violates CEQA.

Confusingly, the DEIR at the same time assumes complete *termination* of use of United's western lease area in order to conclude that any impacts from increased operations at the Project site would be netted out. Moreover, the DEIR is equivocal about whether future use of the west maintenance area by a different airline would even be subject to CEQA. Clearly, it is. The DEIR may not conclude that draw-down of the west lease area operations would net out any impacts from operation of the Project site without committing to no future maintenance use absent environmental review.

The DEIR takes a similarly flawed approach in its discussion of growth inducing impacts. The DEIR states that because the Project would not increase existing maintenance operations, the Project would not induce growth. This ignores the DEIR's admission that future maintenance use of the west lease area is "reasonably foreseeable." Use of the western lease area by another airline would remove a constraint on existing maintenance operations, thereby inducing growth. The DEIR must acknowledge this fact, and commit to analyzing the related impacts.

The DEIR also states that the Project would not increase passenger or gate capacity. To justify this assertion, LAWA must make a clear commitment that United's updated lease will prohibit passenger loading/unloading at the Project site. The DEIR should state what the Project's aircraft parking spots will be used for (e.g., active maintenance, remain overnight/remain all day aircraft parking, cargo loading/unloading),

UAL-AL01-2 Continued

² With the adjacent West Aircraft Maintenance Area ("WAMA") in use, continued use of United's western lease for maintenance operations would concentrate more aircraft maintenance and parking in the western part of the airport than the Master Plan allows. See City's January 8, 2018 comments on the NOP/IS.

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and provide an enforceable commitment that parking spaces will be used only for these UAL-AL01-4 Continued

II. The DEIR Must Fully Analyze the Noise Impacts of All Engine Run-ups, and Disclose the Probable Location of Any Off-Site Engine Run-ups.

The DEIR states that the Project will include a new blast fence for high-power engine ground run-ups, which presently occur at the western maintenance facility but not at the eastern facility. Although the DEIR states that conducting ground run-ups at the Project site would move these operations farther away from sensitive receptors in El Segundo, the DEIR still must accurately evaluate any associated noise impacts, which must include a single event noise analysis.

However, the DEIR omits any analysis of noise from maintenance operations. The Project would enable 200 high power engine run-ups per year, approximately 20 of which would likely occur somewhere other than at the Project site due to adverse wind conditions. The DEIR does not include any noise analysis of these run-ups, or even disclose where these 20 annual run-ups would occur. CEQA requires such disclosure and analysis. El Segundo also requests that LAWA implement real-time noise monitoring for all Project-related run-ups (including a portal on LAWA's website where the public can keep track of single event run-up noise), as is currently conducted at the West Aircraft Maintenance Area.

III. El Segundo Strongly Opposes Use of an "Optional" Steel Laydown North of Imperial Highway, and Use of Imperial Highway as a Truck Route.

In our comments on the NOP/IS, we commended LAWA for not including any construction hauls through El Segundo as part of the Project. The DEIR, however, adds an "optional" construction staging area just north of Imperial and a potential haul route on the eastern half of Imperial. Despite these additions, the DEIR does not include any traffic study section along this stretch of Imperial. The City strongly urges that this

³ The DEIR assumes a total of 22 aircraft parking spaces at the Project site, yet it appears the site could actually accommodate at least 26 spaces—not including any "double parking" that the DEIR discloses could occur. The lease and DEIR either need to include a cap on the number of parking spaces allowed, or else analyze the highest possible number of aircraft that could be maintained at the site at once.



UAL-AL01-7

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Continued

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"optional" staging area be removed in the Final EIR. And, as always, the City asks that vehicle trips avoid El Segundo entirely, when possible.

Thank you for the opportunity to comment on the Project. We request that this firm and the City of El Segundo Planning and Building Safety Department receive a copy UAL-AL01-8 of any proposed revisions to the EIR, including the Final EIR.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Joseph "Seph" Petta

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January 8, 2018

Via E-Mail and FedEx

Maritza Lee Los Angeles World Airports One World Way, P.O. Box 92216 Los Angeles, California 90009-2216

Re: <u>Notice of Preparation for LAX United Airlines East Aircraft</u> Maintenance and Ground Support Equipment Project

Dear Ms. Lee:

On behalf of the City of El Segundo, thank you for the opportunity to review the Notice of Preparation and Initial Study for the United Airlines East Aircraft Maintenance and Ground Support Equipment Project ("Project"). El Segundo expects to be actively involved in the planning process and looks forward to follow-up discussions and close coordination as the Project goes forward.

As LAWA is aware, El Segundo has a number of longstanding concerns related to LAX, particularly around noise and traffic impacts originating on the southern airfield and/or directed toward El Segundo. El Segundo appreciates that, for now, the Project appears to be designed to reduce the physical footprint of United's aircraft maintenance and ground service equipment ("GSE") operations (Initial Study at Table 1), and to move existing high-power aircraft engine run-ups farther from the closest receptors in El Segundo (*id.* at 72). Nevertheless, El Segundo believes that the potential transportation, air quality, and climate change impacts identified in the Initial Study could be further minimized, or avoided, if LAWA describes the Project more thoroughly in the Draft Environmental Impact Report ("DEIR"). LAWA should also ensure the Project is consistent with its prior development proposals and decisions, including those encompassed by the LAX Master Plan, Specific Plan, and the ongoing ground run-up enclosure ("GRE") siting and environmental review process.

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Maritza Lee January 8, 2018 Page 2

Project Description. El Segundo is concerned that the DEIR could fail to sufficiently analyze the Project's potential impacts due to an incomplete or inaccurate project description. The Project would expand the existing eastern United aircraft maintenance area lease, due to relocation of activities currently occurring at United's western maintenance area, for which the lease is expiring in 2020. The consolidation would include "redevelopment" of approximately 38 acres/411,000 square feet for a new maintenance facility and additional aircraft parking positions, among other Project elements. The Initial Study states that "[w]hile the basic elements of redeveloping and improving the East Maintenance Facility have been determined, the exact sizes and configuration of those elements are still being evaluated by the project applicant." *Id.* at 8. While it is perhaps understandable that the DEIR would contain a more detailed project to the public at the earliest opportunity. No uncertainty about the Project's description should persist in the DEIR.

The Initial Study also suggests that LAWA has no plans for the west maintenance lease site after 2020. *Id.* at 1. However, continuation of existing or similar uses is at least reasonably foreseeable because maintenance and aircraft parking facilities already exist. El Segundo has previously expressed concern about expanded aircraft maintenance activities in the vicinity of the western maintenance area. *See* attached West Aircraft Maintenance Area ("WAMA") DEIR comments, Dec. 2, 2013, at 8. The DEIR should state and evaluate the potential future use(s) of the western maintenance area after 2020, and any potential future use of the west maintenance facility site should be consistent with the LAX Master Plan and Specific Plan.¹ Furthermore, the western maintenance area is immediately adjacent to one of four possible locations identified by LAWA for a GRE, one of two GREs required by the 2004 LAX Master Plan. If any future use of the western maintenance site could interfere with the study or environmental review of potential GRE sites, LAWA should disclose this potential. El Segundo has previously asked to be included in the GRE siting, review, and approval process, and reiterates this request here.

The Initial Study also states the Project would not increase the volume of existing maintenance operations. Initial Study at 4. This implies that the Project's operational

¹ The WAMA is located on a site that the Master Plan identifies for employee parking, yet LAWA has not amended the Master Plan to reflect the change in use, against El Segundo's urging. WAMA DEIR comments at 8. Continued use of United's western lease for maintenance operations would concentrate more aircraft maintenance and parking in this part of the airport than the Master Plan allows.

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parameters are defined as the "net" maintenance operations after drawdown of the western maintenance area after 2020. *See id.* at Table 1 (stating Project would include 23 aircraft parking spots, compared to the current total of 34 spots at both lease sites). However, the Project as described does not clearly commit LAWA to ceasing maintenance, parking, or other existing operations at the western facility once that lease expires; indeed, it is reasonably foreseeable that the same or similar uses will continue after 2020. Therefore, unless maintenance operations are to be prohibited at the western facility once United vacates, the DEIR must consider the Project's elements, including the new maintenance facility and 10 additional aircraft parking spots,² as *additive* to the existing United lease components. These existing components are the physical baseline against which LAWA must evaluate the Project, and LAWA cannot assume without substantial evidence that these components will disappear for purposes of the DEIR's analysis.

Similarly, the Initial Study states that the Project would not increase passenger or gate capacity. *Id.* at 4-5. To justify this conclusion, LAWA must make a clear commitment that the updated lease with United will prohibit passenger loading/unloading at the Project site. Regardless, the DEIR should state what the Project's parking spots will be used for (e.g., active maintenance, remain overnight/remain all day (RON/RAD) aircraft parking, cargo loading/unloading), provide an enforceable commitment that parking spaces will be used only for these purposes, and evaluate the associated airport capacity and environmental impacts.

The Initial Study also states that the Project would alter on- and off-airport vehicle movement, and "aircraft movement" on the ground, due to shifting of employees, equipment, and aircraft from United's western maintenance lease to the Project site. *Id.* at 3, 4, 21. The Initial Study does not describe in any detail the anticipated changes in aircraft movement caused by the Project. The DEIR must include this information as well as an analysis of any potential impacts from the changes in aircraft ground operations caused by the Project.

Noise. The Initial Study states that the Project will include a new blast fence for high-power engine ground run-ups, which presently occur at the western maintenance

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UAL-AL01-9 Continued

² Although Table 1 of the Initial Study suggests the Project would only add 4 parking spots to the eastern maintenance area, Figure 6 indicates that the new maintenance facility could provide an additional 6 narrow-body parking spots, for a total of 10 new parking spots.

Maritza Lee January 8, 2018 Page 4

facility but not at the eastern facility. *Id.* at 72 (stating that 2-4 high-power run-ups would occur each week, and would comply with the 11pm-6am ground run-up curfew). Although the Initial Study states that conducting ground run-ups at the Project site would move these operations farther away from sensitive receptors in El Segundo (*id.*), LAWA still must accurately evaluate any associated noise impacts, including as part of a single event noise analysis. LAWA should also consider (as a Project alternative or mitigation, for example) whether construction of a GRE is appropriate at the Project site because the new maintenance facility could provide components necessary for, or complementary to, a GRE. Although this location has not been on LAWA's list of sites under consideration for a GRE to date, it is farther from some sensitive residential uses south of the airport than the western GRE locations LAWA is presently considering, and thus potentially preferable to El Segundo.

Parking. During construction, United employees stationed at the east maintenance facility, and some employees who will be bused to the west facility, will be required to use parking lot "H" instead of parking lot "F." *Id.* at 14. During Project construction, parking lot F will also be used by construction workers. *Id.* at 78. The Initial Study does not state the peak number of United employees and construction workers that would need to use parking lot F simultaneously, and whether the parking lot could accommodate this number. The DEIR must include this information. As LAWA is aware, El Segundo has longstanding concerns about LAX's and its contractors' employees improperly parking within El Segundo's limits, and is worried the Project could worsen this problem, both during and after construction.

Traffic. The Initial Study states that United employees that presently use Imperial Highway to access the west maintenance facility will likely use Century Boulevard to access the Project site once the leases are consolidated. Neither Imperial Highway nor other El Segundo roadways are included in the list of Project haul routes. El Segundo appreciates this aspect of the Project and expects it will remain in the DEIR; as always, the City asks that vehicle trips avoid El Segundo when possible. If the potential arises for construction vehicles or employee traffic to use Imperial Highway, Pershing Drive or internal city streets, the DEIR must disclose this information and LAWA should require these vehicles to use El Segundo's designated truck routes.

Thank you for the opportunity to comment on the Project. We request that this firm and the City of El Segundo Planning and Building Safety Department receive a copy of the DEIR.

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Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Joseph "Seph" Petta

EXHIBIT 1

SHUTE, MIHALY WEINBERGER LLP

396 HAYES STREET, SAN FRANCISCO, CA 94102 T: (415) 552-7272 F: (415) 552-5816 www.smwlaw.com JOSEPH D. PETTA Attorney petta@smwlaw.com

December 2, 2013

Via E-Mail and FedEx

Lisa Trifiletti Capital Programming & Planning Environmental & Land Use Planning Los Angeles World Airports One World Way, Suite 218 Los Angeles, CA 90045

Re: Draft Environmental Impact Report for West Aircraft Maintenance Area

Dear Ms. Trifiletti:

We submit this letter on behalf of our client, the City of El Segundo, to comment on the Draft Environmental Impact Report ("DEIR") recently released by Los Angeles World Airports ("LAWA") for the West Aircraft Maintenance Area ("WAMA" or the "Project") at Los Angeles International Airport ("LAX"). As LAWA is aware, El Segundo has been an active participant in the planning process for the Project and expects to be actively involved in further follow-up discussions.

As explained below, the DEIR is legally inadequate under the standards of the California Environmental Quality Act ("CEQA"), Public Resources Code sections 21000 et seq. If revised to provide all of the required evidence and analyses, the DEIR could well determine that the Project will have potentially significant environmental impacts that cannot be avoided through mitigation, particularly noise impacts resulting from increased operations near the airport's border with El Segundo.

The DEIR's inadequacies begin with the fact that the document fails to accurately and completely describe the Project and its operations once constructed. For those aspects of the Project that the DEIR does describe, LAWA assumes operation levels that would result in less-than-significant impacts, but has not committed to maintain those levels through appropriate enforcement and monitoring. Thus, LAWA has not demonstrated that the impacts analysis correlates with the *actual* level of future operations likely at the WAMA.

Second, the Project as described in the DEIR is not consistent with the LAX Master Plan. As you know, the Master Plan was the subject of major litigation and a negotiated settlement, and was intended to serve as the guide for the airport's future development. The Project, however, would occupy land designated in the Master Plan for an entirely different use. As discussed below, this deviation calls into question the purpose of the Master Plan and LAWA's commitment to following it.

Third, the DEIR raises serious questions about the Project's impacts, particularly its noise impacts on El Segundo. The DEIR entirely disregards El Segundo's noise ordinance as a standard of significance in analyzing the Project's noise impacts, and fails to fully account for low-frequency noise impacts from anticipated engine run-ups at the WAMA. Dr. Sanford Fidell's comments ("Fidell Memo") on the DEIR's noise analysis are attached to this letter as Exhibit 1 and incorporated in their entirety herein.

This letter, which incorporates by reference our October 30, 2012 comments on the Notice of Preparation ("NOP"), attached as Exhibit 2, explains these concerns and other shortcomings of the DEIR. El Segundo calls on LAWA to revise the DEIR to evaluate fully the potentially significant impacts of the Project on the City's residents.

I. The DEIR's Description of the Project is Inadequate.

LAWA must describe the Project completely and accurately in the DEIR. "An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR." San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus (1994) 27 Cal.App.4th 713, 727.

A. The DEIR Does Not Provide Substantial Evidence to Support Its Assumptions About WAMA Operations.

The DEIR frequently states that the assumptions underlying its analysis are "conservative." To the contrary, the Project description is misleadingly vague and openended. LAWA uses arbitrary assumptions about WAMA operations in order to conclude that nearly all of the WAMA's impacts will be less than significant. The assumptions in the DEIR are not supported by substantial evidence, and LAWA has not committed to monitor, maintain, or enforce the operation levels on which its assumptions are based. Without a commitment to monitor, maintain, and enforce operation levels that form the basis of the DEIR's impacts analysis, the analysis lacks credibility and violates CEQA.

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Assumed Operation Levels Must Be Actual Levels: Although the DEIR does not clearly indicate who will use the WAMA, it suggests that LAWA will lease certain uses of the WAMA to tenants rather than make the WAMA available to airlines on a "first come, first served" basis. See, e.g., DEIR at 2-10 (hangar to be used by "eventual tenant"). The DEIR must clarify the anticipated use arrangement because it relates directly to the eventual use of the WAMA, including the assumptions about operations that form the basis for the DEIR. If LAWA has identified one or more tenants for the WAMA—such as Qantas and U.S. Airways, whom El Segundo suspects are intended WAMA tenants based on Table 4.5-9 of the DEIR—the DEIR should confirm this and provide information on the tenancies. Indicating that tenants have been identified or confirmed would also provide evidence of a present need for the WAMA, which, as noted below, LAWA has not sufficiently demonstrated.

To guarantee that its assumptions about WAMA operations and the DEIR itself are accurate, LAWA should include operation controls as terms of any leases with future tenants. Such operation controls should include the number of engine run-ups the tenant may conduct per month or year (not to exceed a total of 60 run-ups per year by all tenants combined, as indicated by the DEIR), and the times of day run-ups may be conducted, observing LAWA's existing run-up curfew from 11 p.m. to 6 a.m. *See* LAWA's Aircraft Noise Abatement Operating Procedures and Restrictions at 5-8 through 5-9, attached as Exh. 3. Terms should also include monthly run-up and other maintenance reports by tenants; a commitment by WAMA tenants to use ground power instead of auxiliary power units, except when APUs are being maintained (*see* DEIR at 2-15, indicating RON/RAD spaces will allow full aircraft functionality without running APUs); a commitment by ADG VI carriers not to exceed 80% power during engine run-ups (as indicated by Table 4.5-9 of the DEIR); and a commitment to tow aircraft to and from the WAMA, rather than taxi under aircraft power, as described in the DEIR. *See* DEIR at 4.5-32.

If LAWA cannot ensure that the operation levels it assumes for purposes of the DEIR's impacts analysis will be the *actual* operation levels (or at least reasonably approximate them), then it must revise the DEIR to use "worst case scenario" operation levels for all impacts, including 100%-power engine run-ups by A380 and B-747 aircraft and 100% taxing to and from the WAMA. *See Bozung v. Local Agency Formation Com.* (1975) 13 Cal.3d 263, 279, 282 (environmental review must include all of a project's potential impacts); *City of Redlands v. County of San Bernardino* (2002) 96 Cal.App.4th 398, 309 (environmental review must consider all activities permitted by project).

Engine Run-ups: The DEIR omits crucial information about the timing and frequency of anticipated engine run-ups during run-up curfew hours. As an initial matter, all information about anticipated levels of operations at the WAMA, especially the kinds of operations that are of greatest concern to neighbors such as El Segundo, should be included in the Project description.

Table 4.5-9 of the DEIR, showing the anticipated number of annual WAMA run-ups by time of day (daytime, evening, and night), indicates that Qantas ADG VI aircraft (A380 and B-747, the largest aircraft at LAX) will not conduct engine run-ups between 7 p.m. and 7 a.m. As these large aircraft are the *only* aircraft anywhere at LAX that, according to the table, will not conduct run-ups during evenings or nights, the DEIR should explain this anomaly, particularly since Table 4.5-11 indicates that A380 and B-747 run-ups at the WAMA may result in noise levels as high as 80 dBA at some locations in El Segundo. Otherwise, the data appears to have been excluded to support a finding of less-than-significant noise impacts.¹

If, on the other hand, the absence of evening and nighttime run-ups by these aircraft implies a commitment by LAWA to daytime-only ADG VI run-ups—an explanation that would justify using this assumption as the basis for the DEIR's impacts analysis—then the DEIR must explicitly make this commitment part of an enforceable mitigation measure. Any lease with future WAMA tenants, such as Qantas, should include a mandatory run-up schedule with penalties for violations.

Table 4.5-9 also indicates that U.S. Airways will conduct 15.6 annual runups between 10 p.m. and 7 p.m. While this time range reflects the CNEL nighttime "penalty" period the DEIR uses to evaluate noise impacts, it conceals whether U.S. Airways run-ups would occur during curfew hours. The table must be revised to indicate when all WAMA run-ups will occur relative to curfew hours.

Finally, it is unclear whether the DEIR's estimate of annual engine run-ups at the WAMA takes into account only "high-power" run-ups, or includes "low-power"

¹ Similarly, Table 4.5-9 shows that the A380 and B-747 are among the only aircraft at LAX (and the only aircraft anticipated at the WAMA) that will conduct runups at 80% power, as opposed to 100%. The DEIR does not explain the reason for the less-than-full power setting. Unless it is an implicit commitment to enforce 80%-power run-ups of ADG VI aircraft at the WAMA—in which case LAWA must be explicit about enforcing this limit—the DEIR should explain why this assumption was used.

Lisa Trifiletti December 2, 2013 Page 5

run-ups as described on page 2-10 of the DEIR. While high-power run-ups require the use of a blast fence or ground run-up enclosure ("GRE"), low-power run-ups may be performed at or above engine idle and do not necessarily require installed safety devices. *See* DEIR at 2-10. If WAMA operations may include low-power run-ups in the apron area in addition to high-power run-ups at the blast fence, the DEIR must say so and include the potential impacts in its analysis.

Remain Overnight/Remain All Day Spaces: The Project description indicates that the WAMA's RON/RAD spaces would serve as parking areas for aircraft awaiting maintenance "and/or placement at a terminal gate for departure." DEIR at 2-9. If the WAMA's RON/RAD spaces will be used for non-maintenance aircraft parking despite the fact that the Project Objectives indicate that aircraft maintenance is the *sole* purpose of the WAMA (DEIR at 2-2)—the DEIR must say so. Additional aircraft parking at the WAMA would free up gates that otherwise are occupied by parked aircraft (*see* DEIR at 2-13, indicating parking at CTA "can become crowded during overnight periods"), thereby creating the potential for increased airport operations. The DEIR, however, repeatedly dismisses the possibility of increased airport operations resulting from the Project. The DEIR must provide an enforceable commitment that RON/RAD spaces will be used only for maintenance, or else discuss the potential impacts of increased airport operations resulting from additional aircraft parking at the WAMA.

Additionally, the DEIR suggests that RON/RAD spaces at the WAMA will provide ground power, precluding the need for auxiliary power units. DEIR at 2-15. The DEIR does not discuss the noise, air quality, or other impacts from APUs. Implying that APUs will not be used at the WAMA is not sufficient; the DEIR must clearly state that APU use will be prohibited (except for maintenance of APUs), or else include the noise, air quality, and other impacts of APU usage in the impacts analysis.

Aircraft Movements to and from the WAMA: The DEIR states that 13 morning (a.m.) and 13 afternoon/evening (p.m.) aircraft movements to and from the WAMA are anticipated each day, for a total of 26 movements per day. DEIR at 2-13 through 14. While the DEIR briefly explains the basis for these assumptions, the information is unhelpful in determining the anticipated intensity of operations at the WAMA, given the remaining uncertainty about the approximate number of aircraft and ratio of larger to smaller aircraft at the WAMA at any given time of day.² Thus, there is

² The DEIR states that the WAMA could accommodate up to ten ADG VI aircraft, a larger number of smaller aircraft, or a mix of aircraft sizes. DEIR at 2-13. The DEIR does not clearly indicate how many smaller aircraft the WAMA could accommodate.

no way to determine whether LAWA's assumptions about aircraft movement are "conservative" or even reasonably reflective of actual use of the WAMA. The DEIR must provide more concrete information about the anticipated ratio of larger to smaller aircraft using the WAMA, and the intensity of use of the WAMA itself on a single day, so that LAWA's aircraft movement assumptions provide a meaningful data point.

Construction Staging: The DEIR states that the Project could displace existing construction staging at the Project site, but that any relocation "would not materially change the general pattern and type of activities that have occurred in these construction staging areas over the past several years." DEIR at 2-15. The DEIR neither indicates *where* existing construction staging may be relocated, nor contemplates the potential impact of relocated staging on the *new* locations. The Project could have significant secondary effects on El Segundo and other airport neighbors if existing construction staging at the Project site is relocated to staging areas immediately adjacent to neighbors' borders, including El Segundo's. The Project description should clearly state where relocation of construction staging may occur, and the DEIR should analyze the potential impacts of this relocation, since these impacts are a reasonably foreseeable aspect of the Project. *See Laurel Heights Improvement Assn. v. Regents of University of California* (1988) 47 Cal.3d 376, 396.

B. The Project Description Does Not Demonstrate That the WAMA Will Not Increase Overall Operations at LAX.

LAWA asserts that the Project will not increase overall operations at LAX. *See, e.g.*, DEIR at 2-9. However, the Project description and the rest of the DEIR do not provide substantial evidence to support this assertion.

The DEIR states that all operations that will take place on the WAMA site—maintenance hangars, engine ground run-ups, RON/RAD parking, and ancillary facilities—currently occur elsewhere at LAX and would simply be consolidated at the WAMA. *See* DEIR at 2-9; 4.5-26 through 31. However, as we explained in our comments on the NOP, the DEIR does not fully and clearly account for existing operations so that they can be compared to WAMA operations that will "replace" them. To demonstrate that the WAMA will not increase airport operations, the DEIR must indicate the location, frequency, and intensity of operations that the WAMA will replace—at the very least, with figures similar to Figure 4.5-1 of the DEIR, showing locations of current engine run-ups. Without a "one-to-one" comparison of anticipated WAMA operations and corresponding draw-downs elsewhere, the DEIR lacks substantial evidence that the WAMA will not increase overall airport operations. Clear

documentation is critical to ensure that the maintenance facilities, RON/RAD parking, and other facilities slated for replacement are actually decommissioned and do not continue to be operated following WAMA completion.

Second, while the total Project area is 84 acres, the DEIR indicates that only 68 acres will be developed, leaving 16 acres undeveloped and unpaved. DEIR at 2-9. The DEIR does not explain why these "unpaved islands" (DEIR at 2-9)—which are approximately the same area as the combined footprint of both ADG VI hangars included in the WAMA, and thus could likely be reconfigured to accommodate another hangar or blast fence—will not be developed as part of the proposed Project. Considering the development value to LAWA of each acre of airport land, it is difficult to imagine that LAWA plans to do nothing with these acres; indeed, the DEIR states that these 16 acres will be graded along with the 68 acres to be developed, suggesting preparation for future development. DEIR at 2-16, fn. 4. If LAWA has reasonably foreseeable plans for developing this land, those plans must be included in the DEIR's analysis. Delaying this analysis for another time, when it should instead be conducted as part of the WAMA, may amount to illegal project segmentation under CEQA. *See Bozung*, 13 Cal.3d at 283-84 (CEQA mandates that "environmental considerations do not become submerged by chopping a large project into many little ones").

Third, the DEIR does not explain why the WAMA—a major, \$175 million infrastructure project, covering a significant portion of the airport's southwest quadrant—is justified by the added capacity of a mere 60 annual, or 5 monthly, engine run-ups. *See* DEIR at 2-13. If the DEIR is to be believed, the WAMA would accommodate less than 2.5% of the airport's current total run-ups (2,496 per year). *See* DEIR Table 4.5-5. It is difficult to understand why a project that would add so little run-up capacity is so urgently needed, unless LAWA plans to do more with it than the DEIR indicates. We strongly suspect that the actual maintenance, RON/RAD, and other activities at the WAMA will be much greater than the DEIR acknowledges and evaluates. This is a serious CEQA problem.

II. The Project Is Inconsistent With the LAX Master Plan.

The 2004 LAX Master Plan guides and provides a comprehensive look at all development at the airport. LAWA, neighboring jurisdictions like El Segundo, and many other stakeholders spent years developing the Plan, which, according to the settlement resolving litigation over the Plan, is a "general plan for the airport, setting out goals, policies, objectives, and programs for the long-term development and use of the airport." The Master Plan itself states that it contains "working guidelines to be consulted

by LAWA as it formulates and processes future site-specific projects." Master Plan, Preface.

As we explained in our comments on the NOP, the Project is inconsistent with the Master Plan. The Plan sets aside the Project site for use as an employee parking facility (DEIR at 5-23) and locates the new western maintenance facilities on the other side of Taxiway AA, immediately west of the existing United-Continental Hangar (DEIR at 5-9). The Project, however, deviates from the Plan by "exchanging" the proposed uses for these sites and making other changes to the Plan, including expanding the footprint of the proposed development west of Taxiway AA. DEIR at 4.6-10. These inconsistencies are a potentially significant impact under the DEIR's own standard: the proposed Project "conflict[s] with an[] applicable land use plan." DEIR at 4.6-4. The DEIR brushes the conflict aside by claiming that the Project area . . . [and] would be consistent with the LAX Master Plan Program by providing an aircraft maintenance area in the southwest portion of the airport." DEIR at 4.6-10. This explanation is insufficient—the Project is not what the Master Plan calls for and therefore conflicts with the Plan.

Either the Project must be changed to comply with the Master Plan, or the Plan must be amended to allow the use proposed by the Project. LAWA cannot legally depart from the approved Master Plan in a substantial way without formally amending the Plan and conducting the necessary CEQA analysis. Amending the Plan would be more than a paper exercise because it would help ensure that LAWA follows through with its proposal to turn the area east of Taxiway AA into employee parking, rather than additional maintenance or other unauthorized facilities. The DEIR must describe LAWA's Plan amendment process or similar measure for ensuring that any future development on or near the site of the United-Continental Hangar, American Airlines employee parking, and former Continental training building is for employee parking only.

El Segundo has consistently objected to LAWA's departures from the Master Plan. LAWA's apparent disregard for the Plan is thus deeply troubling. We urge LAWA to re-commit to following the Master Plan as a "general plan for the airport." If changed circumstances suggest deviations from the Plan, LAWA should re-initiate the planning process so that stakeholders can understand and help shape the overall vision for the airport. Making changes in the piecemeal, low-profile manner embodied by the Project, with its incomplete description and inadequate impacts analysis, leaves the public in the dark and causes serious problems in the environmental review process.

III. The DEIR Fails to Account for the Project's Noise Impacts.

The DEIR entirely disregards El Segundo's noise ordinance as a standard of significance in analyzing the Project's noise impacts. *See* City of El Segundo Municipal Code, Title 7, Chapter 2 ("Noise and Vibration"), attached as Exh. 4.³ El Segundo's standard prohibits the creation of noise levels greater than 5 dB higher than ambient noise levels on residential properties, as well as "loud, unusual, or unnecessary" noise that "disturbs the peace, quiet, and comfort of any neighborhood, or which causes discomfort to any reasonable person of normal sensitivity in the area." Noise Ordinance §§ 7-2-4 through 7-2-6. These are reasonable significance standards for evaluating the Project, which, according to the DEIR, may produce single-event noise levels exceeding 80 dBA at some locations in El Segundo. DEIR Table 4.5-11. Rather than evaluate the impact of these noise levels using El Segundo's standards, however, the DEIR merely states that single-event noise levels "may or may not be perceptible based on the other noise El Segundo residents will *actually* hear from daily WAMA operations, including noise from large aircraft engine run-ups.

By ignoring El Segundo's noise standard and existing ambient noise levels, and relying instead on the FAA's generic "average annual day" standard to assess the Project's noise impacts, the DEIR impermissibly disregards the sensitivity of the community most affected by the Project's noise impacts. *See Berkeley Keep Jets Over the Bay Com. v. Bd. of Port Comrs.* (2001) 91 Cal.App.4th 1344, 1380-81 (recognizing "significance of an activity may vary with the setting" as basis for CEQA's site-sensitive threshold of significance for noise). Failure to address El Segundo's standard may result in significant underestimation of the Project's audible noise impacts.

Moreover, despite El Segundo's recommendations during the WAMA planning process that LAWA carefully study the Project's low-frequency noise impacts, the DEIR's analysis ignores the secondary impacts of low-frequency airborne noise caused by engine run-ups. *See* Fidell Memo at 1. These secondary impacts manifest as rattling in the interiors of homes and have been shown to cause significant annoyance up to one mile away—farther than the Project's distance from many sensitive receptors in El Segundo. *See* Fidell Memo at 3-4. By relying on A-weighted noise metrics in its

³ See also City of El Segundo General Plan, Noise Element, Goal N1 (stating the City's objective to ensure that City residents are not exposed to stationary or mobile noise levels in excess of El Segundo's Noise Ordinance standards), attached as Exh. 5.

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evaluation of the Project's noise impacts, the DEIR does not account for the unique physics or full spectrum of ground-level, airborne engine run-up noise, whose lowfrequency content is more effectively evaluated under a C-weighted analysis. Fidell Memo at 2. The DEIR does not contain a C-weighted noise analysis, even though LAWA is capable of conducting one. *See* Community Noise Roundtable, Recap of Meeting of September 20, 2010, attached as Exh. 6. Consequently, "the magnitude of low frequency sound levels that operations at the WAMA would produce in residences in El Segundo, as well as estimates of the prevalence of annoyance associated with such noise events, are conspicuously absent from the DEIR." Fidell Memo at 2.

In addition to these flaws in the DEIR's noise analysis and the inadequate quantification of engine run-ups discussed in Part I of this letter, El Segundo has the following concerns relating to the Project's noise impacts:

Automated Run-Up Noise Monitoring: The DEIR should include an enforceable mitigation measure requiring rigorous monitoring of the Project's lowfrequency noise impacts by including automated run-up noise monitoring on site and regular public reporting. Currently, LAWA does not report any explicit monitoring of run-ups occurring after curfew hours except "enforcement actions," as indicated in the airport's Quarterly Noise Reports. Reporting "enforcement actions" tells the public nothing about the actual occurrence of engine run-ups during curfew hours. Put another way, LAWA does not currently provide the public with data regarding the frequency or occurrence of run-ups during curfew hours. Rather, LAWA only reports that it has not taken enforcement action in response to such run-ups. That could mean no or few such run-ups occur or that LAWA has elected not to enforce the curfew. An automated system at the WAMA should use readily available technology to identify and report run-ups by distinguishing run-up noise from other low-frequency aircraft noise. Ground-level, airborne engine noise has a unique temporal envelope, spectral balance, and event onset and offset times, and a longer duration than other aircraft engine noise. Fidell Memo at 6. Automated monitoring would enable the airport and the public to "obtain the technical information needed to assess whether the [Project] will merely inconvenience the Airport's nearby residents or damn them to a somnabulate-like existence." Berkeley Keep Jets, 91 Cal.App.4th at 1382.

Location of Ground Run-Up Enclosures: El Segundo is troubled by the removal, after the publication of the NOP, of the GRE from LAWA's plans for the Project. The Master Plan calls for the development of two GREs. Master Plan Addendum at 2-95. Moreover, the 2010 Stipulated Variance approved by LAWA, El Segundo, and others provides that LAWA will design two GREs by 2015. See also In the Matter of

Noise Variance Application for City of Los Angeles et al., Dept. of Transp. Case No. L2010041216 (ordering LAWA to design two GREs). With this deadline rapidly approaching, LAWA must commit to the design and placement of the two GREs. El Segundo recommends that LAWA's "airport-wide GRE siting study" (DEIR at 5-53) commence immediately. The study should conclude before the construction of the WAMA is complete and include serious consideration of the Delta maintenance area and Western Remote Gates as potential GRE sites. As we noted in our comments on the NOP, the GRE planning process should also seek to maximize the degree to which the final GRE structures attenuate/absorb sound through customization of components to meet specifications developed in consultation with El Segundo's noise consultant. The study process should also include evaluation of appropriate GRE use rules/mandates.

IV. LAWA Must Observe El Segundo's Restrictions on Truck Haul Routes.

The Project site currently contains approximately 295,000 cubic yards of accumulated "stockpiled material." DEIR at 2-17. This material will need to be exported off-site for re-use or disposal. *Id.* Haul trucks, in addition to construction trucks for the Project, will enter and exit the Project site approximately 228 times daily during the peak construction month. DEIR at 4.7-20.

As we noted in our comments on the NOP, El Segundo requests that truck trips for the Project avoid the City of El Segundo. If any truck travel through the City occurs, LAWA must ensure that traffic observes the truck haul routes described in El Segundo's General Plan Circulation Element. *See* Circulation Element Exhibit C-13, attached as Exh. 7; *see also* General Plan Circulation Element Excerpts (Goals, Policies, and Objectives), attached as Exh. 8.

Additionally, the DEIR does not evaluate the impact of heavy truck traffic on street pavement conditions. Imperial Highway is already in very poor condition and could be further impacted by Project-related haul truck traffic. The City requests that LAWA include pavement resurfacing on Imperial Highway as a mitigation measure.

V. The DEIR's Consideration of Alternate Sites for the Project is Inadequate.

An EIR must describe a range of alternatives to the proposed project, and its location, that would feasibly attain the project's basic objectives while avoiding or substantially lessening the project's significant impacts. Pub. Res Code § 21100(b)(4); CEQA Guidelines § 15126.6(a). As the California Supreme Court explained in *Laurel Heights*, "[w]ithout meaningful analysis of alternatives in the EIR, neither the courts nor

the public can fulfill their proper roles in the CEQA process." *Laurel Heights*, 47 Cal.3d at 404.

The DEIR fails to justify its rejection of the "West Remote Pads/Gates Site" alternative. In the City's letter commenting on the WAMA NOP, El Segundo recommended that at least some WAMA components, such as a hangar, some RON/RAD spots, and/or a GRE, be built in the Western Remote Gates area. This recommendation was based on the reasonable assumption that LAWA will ensure no net increase in airport operations by decommissioning part, if not all, of the Western Remote Gates. The DEIR, however, ignores the likelihood of decommissioning these gates and rejects the West Remote Pads/Gates Site alternative on the ground that "the site is highly utilized for passenger gate facilities and for aircraft parking (i.e., RON/RAD), including specialpurpose use ... and would not be available for use during the time frame required for development of the proposed Project." DEIR at 5-3. Given that both the WAMA and the Midfield Satellite Concourse Phase I ("MSC North") projects are slated for completion in 2019 (DEIR at 3-6), and the MSC North project will likely require the decommissioning of some Western Remote gates, the DEIR's statement that the Western Remote Gates would not be available as an alternative location during the necessary time frame rings hollow. The DEIR must explain how LAWA will continue operating all of the Western Remote Gates, despite the addition of new gates as part of airport expansion projects elsewhere, such that none of the proposed WAMA operations could be sited at the Western Remote Gates. See Save Round Valley Alliance v. County of Inyo (2007) 157 Cal.App.4th 1437, 1465 (rejecting EIR that included only "barest of facts" regarding alternatives and "vague and unsupported" claims about their merits).

The DEIR's analysis of the "Alternate Site" alternative is also inadequate. The discussion of this alternative does not mention that its location, the Delta maintenance area, is the Master Plan's proposed location for one of the two GREs. Master Plan Addendum at 2-95. The DEIR fails to state that this alternative would enable LAWA to retain the GRE component of the original WAMA design and fulfill part of its obligation to design two GREs by 2015. Moreover, LAWA's disfavor of the Alternate Site alternative's inconsistency with components of the Master Plan, such as the Plan's retention of "approximately 176,000 square feet of existing cargo space" (DEIR at 5-53), is incongruent with LAWA's willingness to depart substantially from other Plan elements for purposes of developing the Project. The Master Plan is a comprehensive blueprint for development at LAX, not an assortment of projects from which LAWA may pick and choose.

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Finally, the DEIR's disfavor of the Alternate Site, Reduced Project, and West Remote Pads/Gates Site alternatives for their purported inability to meet the WAMA's maintenance objectives (*see, e.g.,* DEIR at 5-44 and 5-54) is inconsistent with the Master Plan's clear indication of a planned *net reduction* in overall maintenance activities at LAX. *See* Master Plan Addendum at 2-95 (anticipating net reduction of approximately 250,000 square feet of maintenance facilities). This reduction would require relocating some maintenance activities currently occurring at LAX to other airports. Dismissal of these alternatives for their supposed inability to accommodate all maintenance activities anticipated at the WAMA, and the necessity to accommodate some activities at other airports (DEIR at 5-44), ignores the Master Plan's clear policy directive to reduce maintenance activities at LAX.

VI. Conclusion

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

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

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Joseph "Seph" Petta

cc: City Council
 Greg Carpenter, City Manager
 Sam Lee, PBS Director
 Kimberly Christensen, AICP, Planning Manager

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Exhibits:

- 1. Fidell Memorandum, Resume, and article by Fidell et al. (2003)
- 2. Comments of City of El Segundo on WAMA Notice of Preparation, October 30, 2012
- 3. LAWA Aircraft Noise Abatement Operating Procedures and Restrictions, September 2010
- 4. El Segundo Municipal Code Chapter 7-2 "Noise and Vibration"
- 5. General Plan Noise Element Excerpts (Goals, Policies, and Objectives)
- 6. Recap of September 20, 2010 Meeting of Community Noise Roundtable
- 7. General Plan Circulation Element Truck Haul Route Map (Exhibit C-13)
- 8. General Plan Circulation Element Excerpts (Goals, Policies, and Objectives)

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WRITTEN COMMENT FORM

PUBLIC WORK SHOP FOR THE LAX UNITED AIRLINES EAST AIRCRAFT MAINTENANCE AND GROUND SUPPORT EQUIPMENT PROJECT DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)

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 United Airlines East Aircraft Maintenance and Ground Support Equipment Project. Written comments can be submitted at the Public Work Shop or mailed no later than 5:00 p.m. on **August 13, 2018**. 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: 731/18	
Name: Nicole Kaloshian	
Organization: WSCC	
Address:	
Comment:	
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thanks for the open have to learn more about CANA!	

Please drop completed form into the box marked "COMMENTS" at the August 13, 2018 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., August 13, 2018.

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

UAL-PC02

From: To: Subject: Date:	Smartsheet Notifications <u>MARTINEZ-SIDHOM, BRENDA</u> Addition to Our LAX Comment Form: Notification Wednesday, August 08, 2018 8:42:40 AM	
?		Log In
Our LAX Comment Form (Prod) Changes since 8/8/18 8:40 AM		
1 row added , 1 row changed 1 attachment added		

1 row added or updated (shown in yellow)

Row 1	
Row ID	1
Full Name	John Peery
Company Name	Mercury Air Cargo
Email Address	jpeery@mercuryair.com
Comments	Ms. Angelica Espiritu/ City Planner, Please accept this comment letter under the draft EIR regarding the above referenced project. Thank You John Peery - COO & EVP MERCURY AIR CARGO
Created	08/08/18 8:40 AM
Project	United Airlines – Draft EIR

Changes made by web-form@smartsheet.com

1 attachment added

Dow 1

LAX United East Aircraft Maintenance and Ground Support Equipment Project.pdf (932k) added by web-form@smartsheet.com on Row 1: John Peery

You are receiving this email because you are subscribed to a notification "Notification" (ID# 2565793968875396) on sheet <u>Our LAX Comment Form (Prod)</u> Your notifications include changes made by you. <u>Exclude your changes from all notifications</u> Don't want to receive this notification? <u>Unsubscribe</u> Please do not reply to this mail. For support or questions, please contact us at <u>www.smartsheet.com/gethelp</u> © 2018 Smartsheet Inc. | <u>Contact</u> | <u>Privacy Policy</u> | <u>User Agreement</u> <u>Report Abuse/Spam</u>

MERCURY AIR CARGO, INC.

August 3, 2018

Ms. Angelica Espiritu, City Planner Los Angeles World Airport P.O. Box 92216 Los Angeles, CA 9009-2216

RE: LAX United Airlines East Aircraft Maintenance and Ground Support Equipment Project

Dear Ms. Espiritu,

Please accept this comment letter under the draft EIR regarding the above referenced project.

Mercury Air Group previously commented during the NOP for the Draft EIR. Our comment requested the addition of two important modifications to increase pedestrian and traffic safety. We are happy to report that we have worked with United Airlines to have those concerns addressed and I am pleased to UAL-PC02-1 inform you that we now fully support the project. The attached drawing incorporated by the UA project team addresses our prior comments and coordination efforts.

Thank you.

Sincerely, John E. Reery

Chief Operating Office and Executive Vice-President Mercury Air Cargo

